

**2022**

# K-12 EdTech Safety Benchmark: National Findings – Part 1

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# 2022 K12 Edtech Safety Benchmark: National Findings – Part 1

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## 2 Executive Summary

This K12 Edtech Safety Benchmark report, the first of four, contains findings from an extensive, rigorous, and statistically significant research project that provides a deep look at children's edtech safety across U.S. schools.

The findings are disturbing. They clearly show personal information safety risks to children and families are present and pervasive in the technology recommended and used by U.S. educational institutions, including:

- Nearly all apps (96%) share children's personal information with third parties, 78% of the time with advertising and monetization entities, typically without the knowledge or consent of the users or the schools, making them unsafe
- 28% of apps were Non-Education Specific, such as The New York Times, YouTube or Spotify, effectively providing no limits or guardrails for children
- School apps (23%) expose kids to digital ads, which creates a risk that personal student data is being sent into advertising networks, with no way for the public to inspect where it goes or how it's used; more than half of those apps (13%) use retargeting ads, which use cookies, search and site history to serve up targeted advertising; this means even more personal student data is being sent into advertising networks to better serve the advertisers
- Google dominates K12 edtech as the prime supplier of both hardware and software, raising questions about the safety of having children deeply connected to the internet by the world's leading advertising platform

These and other research findings are summarized below and further developed throughout the report.

The research was conducted by the Internet Safety Labs (ISL, previously the Me2B Alliance), an organization dedicated to independent software product safety testing.

The safety benchmark validates and expands findings published by the ISL in its "[School Mobile Apps Student Data Sharing Behavior](#)" research (Spotlight Report #1, May 2021). That seminal study led to this massive project using actual analysis of apps and network traffic to examine in depth the broader question of what kind of safety risks exist across all K12 Edtech apps, especially in apps that are mandatory for students.

## 2.1 Scope

This benchmark evaluated K12 technology used in a random sampling of 13 schools in each of the 50 states and the District of Columbia, 663 schools in total, covering about 455,882 students.

In that sample, 1,722 apps (technologies) were either recommended or required by at least one school as indicated by the school and/or the district website. Internet Safety Labs tested 1,357 of those apps, collecting over 88,000 data points on the apps (including capturing network traffic for the apps) and over 29,000 data points on the schools.

This national summary findings report is the first of four reports on this substantial dataset.

The purpose of this research is to provide a baseline safety measurement of technology commonly used by K12 schools, which can be repeated every 3–5 years to evaluate safety trends.

**50** states + D of C  
**663** schools  
**455,882** students  
**1,722** apps  
**117,000+** data points

## 2.2 Key Findings

### 2.2.1 Most apps used by K12 students are unsafe for children

Apps and technology that expose personal information about children and their families to technology providers, third-party marketers, advertisers and often the internet at large are not adequately safe for children.

At a minimum, it fuels marketers' and data brokers' personal data profiles ultimately used to bombard young minds with highly targeted and persuasive advertising or opinions. At worst, in the wrong hands it can lead to emotional trauma, aberrant seduction or even physical danger with location information.

Further, data is forever. For instance, mental health information gleaned from a child's innocent use of a mental health tracker can become a problem in later years as a teen or an adult.

To help establish guidelines for child-safe technology, the ISL developed a rigorous safety scoring rubric to evaluate K12 edtech apps.

The ISL scoring method evaluates many factors, including extensive and automated data gathering and sharing routines often buried deep inside app software components, as well as the observed network data sharing traffic to third parties.

Under the evaluation rubric, Do Not Use apps are judged too dangerous for use by students and High Risk means data is being shared with high-risk entities.

Based on the data analysis and ISL scoring, edtech apps were found overwhelmingly unsafe for use by students.

- **78%** of apps were scored **Do Not Use** and **18% High Risk**, meaning **96% of edtech apps are unsafe for students**.
- **74.9%** of all apps included one or more **Very High Risk** internal software component, known as SDKs, likely to share data with high-risk entities.
- **79%** of apps access **location** information based on permission analysis.
- **52%** of apps access **calendar** and **contacts** information.
- Of the top 25 **recommended** apps, **72%** were scored **Do Not Use** and **8%** were **High Risk**.
- Of the top 25 **mandatory** apps, **56%** were scored **Do Not Use**, **20%** were scored **High Risk** and the remainder were untested.

## 2.2.2 Custom apps for school districts (aka school utility apps) are among the least safe apps

One might reasonably expect that mobile apps commissioned by school districts for use by students, parents, and teachers would be safe for kids. On the contrary, we found these apps to be among the least safe. The situation is made even more problematic given that these apps are promoted by the schools, such that we tagged them as “mandatory or key” for students.

- No Custom app received our safest score of Some Risk, and 89% of Custom apps were rated Do Not Use.
- Compared to Generic apps, Custom apps accessed Location Information and Social Information (address book, calendar) more, with 81% of Custom apps accessing Location information, and 69% of Custom apps accessing Social Information.
- Custom apps had more traffic to Facebook, Amazon and Twitter than generic apps.
- 61% of Custom apps were observed sending data to Google, significantly higher than the 49% of apps as reported in Spotlight Report #1.

## 2.2.3 School-recommended tech isn’t strictly Edtech, nor is it strictly kid tech

There is much new regulatory activity relating to child-safe software design, which hinges on the notion that some technology is for kids and some is not. This boundary is much more liquid than current thinking allows. 28% of the apps recommended or

required by schools would not meet any proposed criteria to be classified as strictly for kids and therefore would not be subject to any child-safe design requirements.

- In total, 481 or 28% of the apps recommended or required by schools were not designed for use by children.
- 49% of the of apps recommended or required by schools were Non-Education Specific (NES) at 28% and [Edtech] Other (O) at 21%.
- The non-education specific apps include news publishers like The New York Times, music platforms like Spotify, donation service organizers like Bloomerang, and magazine e-readers like Flipster.
- Edtech Other includes educational games, health apps, and general productivity apps, among others.
- 85% of the NES apps were not designed for use by children, whereas 81% of the O apps were designed for use by children.

## 2.2.4 Edtech contains digital advertising

Digital advertising is inherently risky for people, never mind children, due to the potential for [staggering information sharing](#). Retargeting (i.e., personalized) ads expose even more personal student data into the ad networks, which is why it is expressly prohibited in California's SOPIPA (Student Online Personal Information Protection Act), and several other state laws modeled after California's SOPIPA.

- 23% of apps recommended or required by schools included ads.
- 13% of apps recommended or required by schools included retargeting ads.

## 2.2.5 Google dominates K12 edtech in the US

With a primarily advertising-based business model and a vast and complicated business, Google's presence in US K12 schools through Google-produced hardware and software is deeply worrisome.

- **75%** of schools that provide personal computing devices to students are providing **Chrome OS based devices** (Chromebooks or Chrome tablets).
  - Devices based on **Apple** OSes were the next closest with only **34%**.
- **68%** of apps were observed sending data to **Google**.
  - This aligns also with the fact that **70%** of all apps included **Google SDKs**.
    - **56.9%** of **iOS** apps included **Google SDKs**; whereas **Android** apps never include **Apple** SDKs.
  - **Apple** was the second most heavily trafficked platform with **36%** of apps sending data to Apple. (Similarly, **38%** of apps included **Apple** SDKs.)
- Google developed the most apps in the top 25 mandatory/key apps with five (5) apps.



- Google Classroom was the second most required app with 27% of all schools requiring it.
  - PowerSchool Mobile was the most required app with 28% of schools requiring it.
- The Google Firebase analytics SDK was the most frequently used SDK across all apps; 67% of all apps with SDKs used Firebase.
- The top 5 SDKs used across all apps were Google SDKs.

## 2.2.6 82% of schools provide personal computing devices

As expected, most schools (82%) provide personal computing devices to students. This means schools need to have much more robust IT, cybersecurity and overall technology support capabilities in order to keep students safe while using technology.

## 2.2.7 Which are safer: Android or iOS apps?

In our earlier research ([Spotlight Report #1](#)), it seemed that iOS apps were appreciably safer than Android apps based on SDK risk. However, the results of this benchmark suggest that the difference in inherent safety of the two platforms is more complicated. Apps can be made safe — or unsafe — for people on either platform. However, Android apps do appear to be less safe overall than iOS apps. This bears further investigation.

- Safety scores were nearly the same across both OSes, but Android apps held a slight advantage.
  - 5% of Android apps had only Some Risk, compared to 3% of iOS apps.
  - 76% of Android apps were rated Do Not Use compared to 80% of iOS apps.
- However, based on SDKs, Android apps continue to be riskier:
  - On average, **Android** apps Include **nearly 3 times as many Very High-Risk SDKs** than **iOS** apps, **6.5** compared to **2.4**.
  - **iOS** apps were more often found to have zero (0) SDKs than Android apps with **68%** of the apps with no SDKs being iOS app.
  - **89.9%** of **Android** apps included **Very High Risk** SDKs as compared to **63.6%** of **iOS** apps
- **100%** of **Android** apps requested **Location** permissions.
- **iOS** apps more frequently **sent data** to all **six** large **platforms** than **Android** apps.
- **62%** of the safest apps were **iOS** apps.
- **80%** of the least safe apps were **Android** apps.

## 2.2.8 Recommending Technologies to Students: More Isn't Better

Several schools in our sample (40%) provided lengthy lists of recommended technologies for students with an average of 125 technologies listed per school. Interestingly, this number increased for schools that seemed to be doing some kind of vetting of technologies (26% of schools), to 172 technologies per school.

Schools are no doubt trying to be helpful to students by recommended technology, but in this case, given the poor scores of apps in this research, more isn't better.

- For schools/districts that had aggregated lists of recommended technologies, the average number of technologies was a staggering **125** technologies.
- For schools/districts that provided lists of approved technologies, the average number of technologies listed was an even more jaw-dropping **172** technologies.
- We found one school with a list of approved technologies topping out at **1,411**.

## 2.3 Wrapping Up – toward a safer Internet

Internet Safety Labs, a 501(c)(3) non-profit, is on a mission to correct the long-standing omission of product safety testing for software driven products. ISL is an independent software product safety organization. Our mission is to ensure safety in connected products and services through safety standards, product research, product safety audits and policy advocacy. We safety test every physical product in our lives and it's time we do the same with software.

While this K12 Edtech Safety Benchmark report and the research data we have compiled may seem discouraging, it is our hope that it will stir a broader awakening to the real safety risks present in the internet and the technology we use with it. It is also important to note that this work establishes a *baseline* measurement, and is the first of its kind in providing a large-scale, independent software product safety audit.

It's often said that the first step to dealing with a problem is recognizing there *is* a problem. This benchmark provides a clear indication of where improvement is needed and Internet Safety Labs is here to help developers and LEAs help keep students safe.

Throughout 2023 we will continue to share more data and findings from this pivotal 2022 K12 Edtech Safety Benchmark.

For more information and to follow our ongoing progress, please visit [the Internet Safety Labs website](#).

## 3 Glossary

### 3.1 Advertising

In this report, we use the term Advertising to mean digital advertising of any sort.

### 3.2 K12

K12 is shorthand for kindergarten through twelfth grade, the full range of primary education for children in the US.

### 3.3 Contextual Advertising

Contextual advertising refers to digital advertising content based on characteristics of the publication site, not based on characteristics of the individual (i.e. not personalized).

### 3.4 Custom Apps (aka School Utility Apps)

For this research, we use two broad distinguishing categories for mobile apps: Custom and Generic. Custom apps are mobile apps that have been commissioned by a local education entity (i.e. either a school, a district, or a state-level entity) and are customized. In [Spotlight Report #1](#), we referred to these apps as School Utility apps. In this research, we refer to them as Custom Apps.

These apps are often provided by large edtech platform manufacturers like Blackboard and Apptegy. The apps are essentially skin-able versions of the same app, used by hundreds of schools. These apps can appear in app stores with the developer listed as the platform manufacturer *or* the LEA who commissioned the custom app. We will probe this further in a future report.

### 3.5 Edtech

Edtech is the collection of digital technologies (app, webservices, etc.) that are used in an educational capacity, whether in schools (primary, secondary, post-secondary, adult education, etc.), or for individual, personal educational and enrichment purposes.

### 3.6 Edtech App Category

Edtech apps come in a very wide range of functionality and utility. We created an edtech typology to compare like-to-like edtech apps. The categories are listed here and details on the typology can be found in Appendix A.

- **Classroom Messaging Software (CMS)**
- **Community Engagement Platform (CEP)**
- **Digital Learning Platform (DLP)**

- **Learning Management System (LeMS)**
- **Library Management Software (LiMS)**
- **Non-Education Specific (NES)**
- **[Educational] Other (O)**
- **School Transportation Software (STS)**
- **Safety Platform (SP)**
- **Single Sign On (SSO)**
- **School Management Software (SMS)**
- **Student Information System (SIS)**
- **Study Tools (ST)**
- **Virtual Classroom Software (VCS)**

### 3.7 Generic Apps

Generic apps are mobile apps that are available off the shelf (OTS) to local educational agencies, parents, students, teachers, etc. These apps are typically not customized.

### 3.8 Local Educational Agency

“Local educational agency or LEA means a public board of education or other public authority legally constituted within a State for either administrative control or direction of, or to perform a service function for, public elementary schools or secondary schools in a city, county, township, school district, or other political subdivision of a State, or for a combination of school districts or counties as are recognized in a State as an administrative agency for its public elementary schools or secondary schools.” <https://sites.ed.gov/idea/regs/c/a/303.23>

For the purposes of this research, a school, a school district, a state school board, or any combination of the above can comprise a local educational agency.

### 3.9 Permission Categories

We classified iOS and Android sensitive permissions into seven Permission Categories:

- **Location** includes any permission that potentially allows apps to determine the user’s geographic location. Permissions such as wifi network names and bluetooth connections are included in this category because in many cases these names are distinctive and can be compared against databases to guess the location.
- **Files** include any permission that allows apps to list user data files or their contents, whether in the cloud or on device. This access is risky both because files and filenames can include personal information and because it can be

used to fingerprint and reidentify a user even if they have reset other identifiers.

- **Join User Identifiers** includes any permission that directly assists advertising networks that wish to track users across apps or across device, such as with Apple's ID for Advertising (IDFA).
- **Physical Environment** includes permissions that reveal information about the user's physical environment, such as through camera and microphone.
- **User Behavior** permissions include anything that would be useful to advertising networks seeking to learn more about a user, such as their psychology or interests.
- **Crash Logs** include permissions that allow the app publisher to receive information when the app crashes. There is a risk of this information including personal details.
- **Social Information** includes permissions that reveal who the user associates with, as well as when or where they do so. This includes calendar and contacts.
- **Phone Service** includes permissions that reveal who the user's carrier is or whether they currently have service. This can serve as a proxy for location. It may also reveal financial wellbeing.

### 3.10 Retargeting Advertising

For this research, retargeting advertising is digital advertising based on the user's browsing history.

### 3.11 School Utility Apps (aka Custom Apps)

See Custom Apps.

### 3.12 Software Developer Kit (SDK)

From our [Spotlight Report #1](#):

"Most mobile apps are built with SDKs, which provide app developers with pre-packaged functional modules of code, along with the potential of creating persistent data channels directly back to the third-party developer of the SDK. SDKs almost always start running "behind the scenes" as soon as a user opens a mobile app – without the express consent of the user. These SDK providers use this data for a variety of reasons, from performing vital app functions to advertising, analytics and other monetization purposes."

## 4 Introduction to the Benchmark

In May of 2021, Internet Safety Labs (ISL, previously Me2B Alliance) published research evaluating the behavior of a small set of K12 “school utility apps”. School utility apps are all-purpose communication apps that are typically custom apps or school-branded [white-labeled] apps. The findings of that research were disturbing and prompted the broader question of what kind of safety risks exist across all K12 Edtech apps, especially apps that are mandatory for students?

This current research performs a more rigorous and statistically significant scale of technology auditing and provides a look at edtech safety across US schools.

Throughout 2022, ISL has been collecting data on a sample of 13 schools in every state in the US plus the District of Columbia. In the process, we have assembled a sizable database of both school/district behaviors relating to digital technology, as well as a database of over 1700 apps that schools/districts are recommending or requiring students to use.

### 4.1 Benchmark Reports

Due to the very large volume of data in this nearly year-long research project, we are releasing the results in a series of reports.

The current plan for reports is as follows (subject to change):

1. 2022 Edtech Safety Benchmark: National Findings (Part 1) [this report].
2. 2022 Edtech Safety Benchmark: State Findings – state summaries for all 50 states.
3. 2022 Edtech Safety Benchmark: National Findings (Part 2) – including state and regional comparisons, and nationwide demographic analysis.
4. 2022 Edtech Safety Benchmark: Regulatory and Technology Vetting Impacts – school and district technology vetting, notice and consent practices across the US, as well as third-party certification analysis.

### 4.2 What the Benchmark Measures: K12 Edtech App Safety

Our primary focus was measuring potential and actual safety risks in K12 Edtech apps. A key part of this research entails calculating an ISL Safety Score for each app.

#### 4.2.1.1 The ISL Safety Score

The ISL Safety Score is a new safety scoring rubric based on the observed and measured behavior of the apps themselves. The ISL Safety Score expands on the predicted risk based on SDKs included in the app by adding in observed app behaviors. There are three key components to the ISL Safety Score:

- Measured Risk: SDKs included in the app and their risk ratings,
- Observed Risk: Observed network traffic to what we refer to as the “big six” data aggregators (Adobe, Apple, Amazon, Facebook, Google, and Twitter), and
- Observed bad behaviors:
  - Advertising presence,
  - Retargeting advertising presence,
  - WebView use,
  - Dangling domain presence,
  - Inclusion of Max Preps (an advertising supported platform analyzed by us in [Spotlight Report #4](#)).

Important to note that the scoring criteria for this benchmark are unique to the domain of K12 Edtech. For a different industry vertical (such as FinTech, for example) the scoring categories will be the same, but the criteria/thresholds will be different.

There are four possible outcomes for the ISL app Safety Score:

- **Some Risk:** This represents the “safest” of all safety scores. Note that “no risk” is not an option in our scoring rubric as all apps entail some level of risk.
- **High-Risk:** This represents the middle tier of safety risk. Apps that receive this rating meet at least one of the following criteria:
  - Presence of high-risk SDKs (at least one Very High Risk or High Risk SDK).
  - App’s use of Webview.
  - Presence of data aggregators: Google or Apple, as determined from either the presence of SDKs or from network traffic analysis.
  - Presence of one or more dangling domains in the app.
- **Do Not Use:** This score represents the least safe apps and ISL recommends that these apps are not safe for students. Apps receive this score if they meet at least one of the following criteria:
  - Presence of advertising (of any kind). The safety score doesn’t distinguish between contextual and retargeted advertising in K-12 ed tech apps, since no matter what kind of advertising is present, student data is being shared/leaked into advertising networks. This is dangerous because there is no way for the public to inspect where the data goes or how it’s used.
  - Presence of one or more Data Broker SDKs (per the California and Vermont Data Broker registries).
  - Presence of data aggregators: Facebook, Amazon, Twitter, or Adobe, as determined either by the presence of SDKs or from network traffic analysis.
  - Presence of MaxPreps. Refer to our earlier research which deeply examines the extremely risky behavior of MaxPreps, an advertising school sports platform [owned by CBS/Viacom, parent to Disney] used

by hundreds of schools.

<https://internetsafetylabs.org/resources/reports/spotlight-report-4-me2b-alliance-product-testing-report-deeper-look-at-k-12-school-utility-apps-uncovers-global-advertising-company-from-cbs-viacom-unexpected-security-risks/>

- App uses resources without asking for and receiving permission.
- **Unable to Test:** We were unable to test several apps due to a variety of reasons:
  - App required school login credentials in order to exercise even basic functionality.
  - App was broken.
  - App was a paid app.

Table 4.1 summarizes the ISL Safety Scoring rubric.

**Table 4.1 ISL App Scoring Rubric**

SOME RISK	HIGH RISK	DO NOT USE	UNABLE TO TEST
	Presence of at least one (1) SDK that is High Risk or Very High Risk	Presence of advertising (any)	Login required and there's core functionality that we weren't able to access as a result
	WebView Use	Presence of one (1) or more registered Data Broker SDKs	Paid app
	Presence of up to two (2) of the following data aggregator platforms (SDKs or NW traffic): Apple, Google	Presence of one (1) or more of the following data aggregator platforms (SDKs or NW traffic): FB, Amazon, Twitter, Adobe	Broken App
	Presence of a dangling domain	Presence of MaxPreps	

#### 4.2.1.2 Potential Versus Observed Safety Harms

Our original 2021 research measured *potential* and likely safety harms that were derived by analyzing the SDKs present in an app. This current benchmark improves upon that by also including *observed*, actual safety risks measured by assessing the app's network traffic flow. Table 4.2 summarizes the app behaviors measured in the benchmark.



**Table 4.2 Measured Risks and Harms**

RISKS	OBSERVED HARMS
Volume and risk categories of SDKS in the app.	Network traffic analysis, including noteworthy 3 <sup>rd</sup> parties (aggregators or data brokers) receiving student data.
Types of data collected or accessible by app.	Presence of advertising (of any kind).
App use of WebView.	Presence of dangling domains.

### 4.3 Scope of the Benchmark

This benchmark evaluates technology in use across all 50 states plus the District of Columbia by examining the behavior of mobile app versions of technologies recommended or required by schools, as identified through examination of school and district websites. NOTE that schools (students, parents) may be using webservice versions of the technologies and not always the app. We did not measure webservice behavior, but we expect it to be comparable. It is possible that webservice behavior will turn out to be worse due to cross-site trackers.<sup>1</sup>

We randomly sampled 13 schools in each state and identified and evaluated all the apps used by the schools. This resulted in the analysis of 663 schools, and identification of 1722 apps (or digital technologies) in use across schools in the sample.

**Table 4.3 Sample Summary**

Total # of Schools	Total # Apps Recommended or Required by Schools	Total # of Apps Scored
663	1722	1357

Broken and paid apps were not tested in this research. Note that the total number of apps scored is higher than the total number of apps tested due to our ability to

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<sup>1</sup> While there are various theoretical mitigations sometimes possible in browsers and not possible in apps, these mitigations are not meaningfully useful by students.

identify “Do Not Use” apps through the presence of advertising/Very High-Risk SDKs. As our research made clear, SDKs risk analysis has proven to be extremely accurate as compared to observed network traffic. Section 5.6 provides the network traffic analysis.

## 4.4 Types of K12 School Apps (Edtech Typology)

In expanding the research scope from School Utility Apps to *all* Edtech apps, we needed a K12 Edtech typology to categorize and compare apps by type. We discovered early on, however, that there is no single definitive typology that categorizes all the types of K12 Edtech in use. Thus, we evaluated several different categorization schemas to arrive at a final typology, mainly based on [G2’s Edtech taxonomy](#) (see Appendix A for details).

We added the category, “Non-Education Specific”, due to the recommendation of many general purpose technologies/websites/apps by schools. Each app identified in the research was assigned to one of these categories.

## 4.5 Key Research Questions

Our original research (Spotlight Report #1) unveiled several disturbing findings regarding the safety of school utility apps. Thus, we were interested to understand the following key questions about K12 edtech in use across the US. All of the questions are noted here, though this report only addresses the questions in bold. Answers to the other questions will be provided in the reports described in Section 4.1.

1. **How safe is the most commonly used K12 Edtech in the US?**
  - a. **What student data is being collected by these apps?**
  - b. **What third parties (data processors) have access to student data in the apps?**
  - c. **What third parties (data processors) are receiving students’ data?**  
Particularly for kids under the age of 10 (5<sup>th</sup> grade)?
  - d. **How often is student data being shared with corporate entities, and advertising entities in particular?**
  - e. **How much in-app advertising are students being exposed to?**
    - i. **How much *targeted advertising* are students being exposed to?**
  - f. **How often do we see dangling domains apps?**
  - g. **How often do we see hijacked/malicious domains in apps?**
  - h. **Which apps are presenting the most safety and privacy risks to children?**
    - i. What are the greatest safety and privacy risks to children?
  - j. **How risky are the most widely used apps?**
2. How many schools in the US are exposing students to risky technology?
3. Are there particular app developers that are riskier than others?

4. Are there differences in the safety of K12 Edtech in use based on geographical region, population density, ethnicity/race, income level, or public/private school, and custom vs. generic?
  - a. School grade level
- 5. Are there differences in the safety of K12 Edtech in use based on type of app?**
6. Are apps that are “certified” by typical Edtech certifications safer than those that aren’t?
7. Are parents/students being informed about the data processing in technology mandated or recommended by schools?
  - a. Do they provide written consent or permission, and does it cover all the technology in use?
    - i. Are there patterns of behavior based on region, population density, income level, ethnicity/race, or public/private schools?
  - b. How much technology is off the shelf and how much is contracted through the school or the district?
8. What kind of technology vetting are schools performing?
  - a. Are there patterns of behavior based on region, population density, income level, ethnicity/race, or public/private schools?
9. What effects are regulations having on schools and K-12 edtech?
  - a. What kind of effect is COPPA having on the safety of ed tech used in K-12 schools?
  - b. What kind of effect is COPPA having on schools’ technology choices and vetting behaviors?
  - c. What regulation seems to be having the most positive impact on tech safety?
10. What information do 3<sup>rd</sup> parties get from the website trackers?
  - a. How many school websites have risky trackers?
    - i. By total, region, school type (public/private), population density, income level, ethnicity/race.
  - b. Which companies have the most trackers on school websites?

## 5 National Findings

### 5.1 General Summary Data

#### 5.1.1 Schools

As noted earlier, we analyzed 13 schools in every state and the District of Columbia, ensuring an evenly distributed mix of grade level, weighted by geography category (obtained from the National Center for Education Statistics [Search for Public Schools \(ed.gov\)](https://nces.ed.gov/ipeds/data/ipedsdatamart/datauser.asp)). We also included one (1) private school in each state, resulting in 7.8% of the sample being private schools, closely approximating the 9% of students enrolled in private schools in the US<sup>2</sup>, though not resulting in enough data for us to represent private school behavior within a state.

We feel this sampling methodology is a viable reflection of the entire nation and as such, our results can be extrapolated across the US public schools with reasonable confidence. (See Section 8 for more details on our sampling methodology.)

**Table 5.1 All Schools in Benchmark Sample by Grade and Public/Private**

Elementary School	Middle School	High School	Private School (any grades)
204	204	204	51

**Table 5.2 Public Schools in Benchmark Sample by Geography**

Rural	Suburban	Town	City
154	195	99	164

**Table 5.3 Private Schools in Benchmark Sample by Geography**

Rural	Suburban	Town	City
5	18	3	25

Appendix B includes the list of all schools by state included in this benchmark.

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<sup>2</sup> <https://nces.ed.gov/fastfacts/display.asp?id=55> Accessed on 11/26/22.

## 5.1.2 Apps

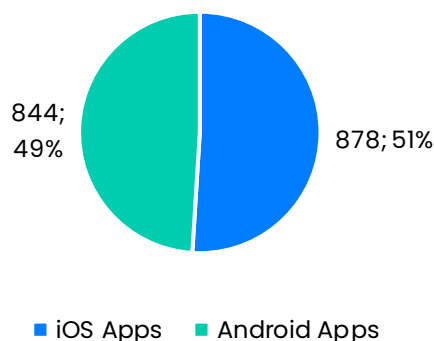
As noted earlier, from the analysis of the 663 schools, 1722 apps were identified as either recommended or required by the school or the district<sup>3</sup>. Of those 1722 we were able to score 1357. The charts in this section describe the sample set by operating system (iOS vs. Android), Custom vs. Generic, and by Edtech category.

## 5.1.3 App Sample Key Findings

- Most apps were Community Engagement Platform (CEP) apps, Non-Education Specific (NES) apps, and Other (O) apps. The apps tested in these three categories made up 77% of all tested apps.
- 85% of NES apps were not designed for exclusive use by children.
- 81% of O apps were designed for use by children.
- In total, at least 481 (28%) of the apps in the sample were not designed for exclusive use by children.
- There were slightly more iOS apps (51%) than Android apps (49%) in the total list of apps. Similarly, of the 1357 apps tested, 51% were iOS and 49% were Android.

## 5.1.4 All Apps

Figure 5.1 — All Apps by OS



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<sup>3</sup> We looked at the district websites in addition to the school websites, since the district commonly chose (and licensed) technology for use by all schools in the district.

Figure 5.2 — All Apps by App Category

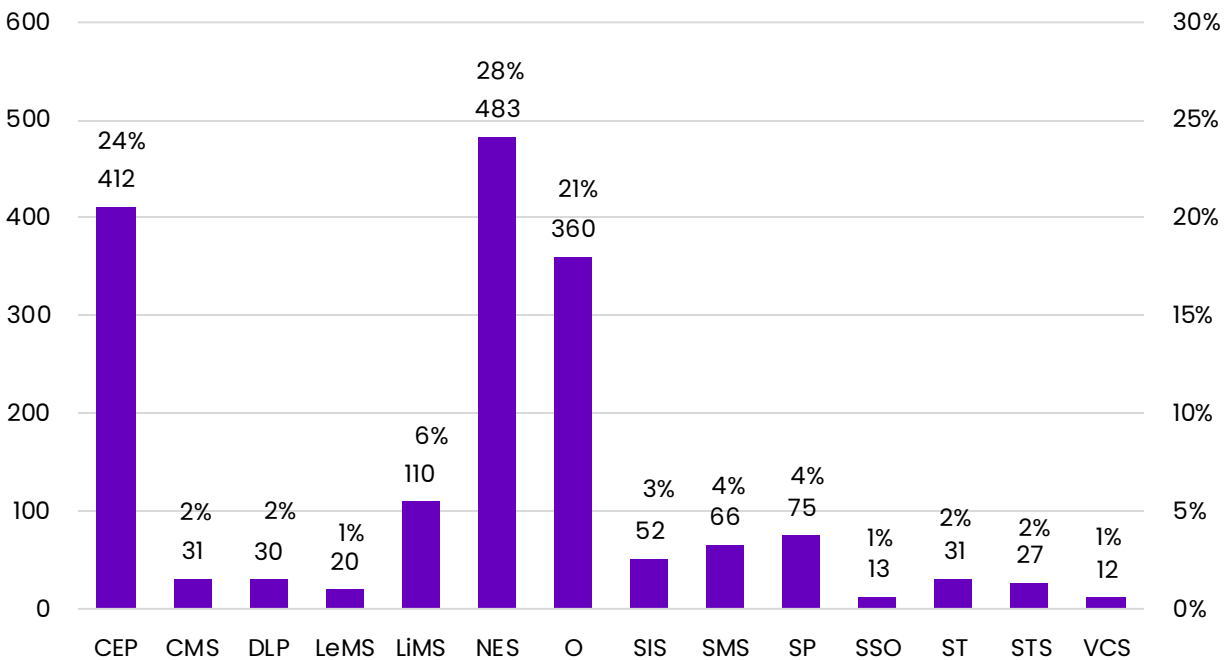
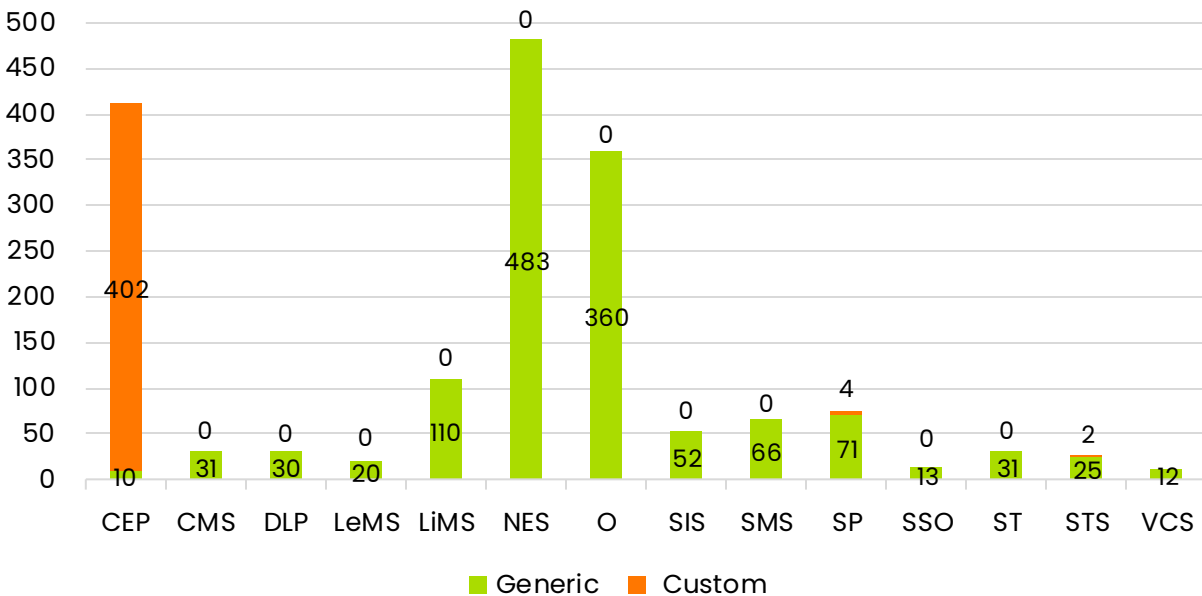


Figure 5.3 — All Apps by Category and Custom vs. Generic



#### 5.1.4.1 NES and O Apps for Adults vs. Children

Since the Non-Education Specific (NES) and [edtech] Other (O) comprised nearly 50% of the technologies being either recommended or required by schools, we further categorized those apps to indicate if they were clearly targeted and built for kids or not. Not surprisingly, most (85%) of the NES apps were *not* designed for

children, but 81% of the O apps were. When combined, 57% of the apps in the NES and O categories were *not* designed for children.

According to this analysis, at least 476 (28%) apps in the sample weren't for children.

Note that we didn't perform this analysis on apps in the remaining categories so it's sure to be low. (For instance, the VCS category includes tools like Zoom and Microsoft Teams, which are not designed for kids.)

Figure 5.4 — NES Apps for Children

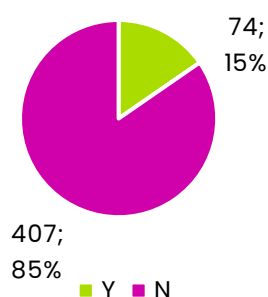


Figure 5.5 — O Apps for Children

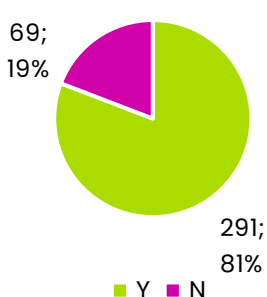
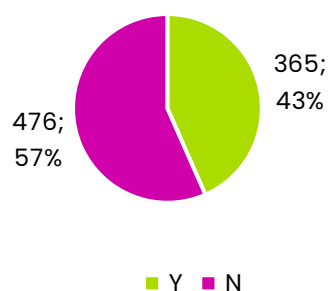


Figure 5.6 — NES & O Combined for Children



### 5.1.5 Scored Apps

Of the 1722 apps in our sample, we were only able to score 1357 apps. There were three contributing factors for being unable to score an app:

1. The app was broken,
2. The app required a school login, or
3. The app was a paid app.

In total there were 365 apps in the list that were not scored due to the above three reasons. This section provides characteristics of the 1357 scored apps.

Figure 5.7 — Scored Apps by OS

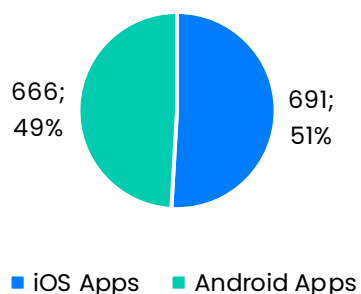


Figure 5.8 — Scored Apps by Category

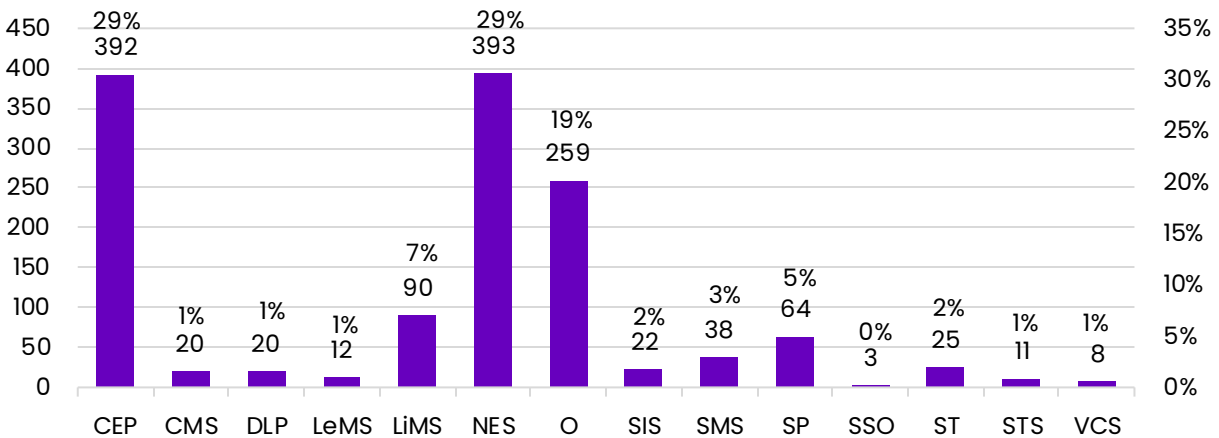
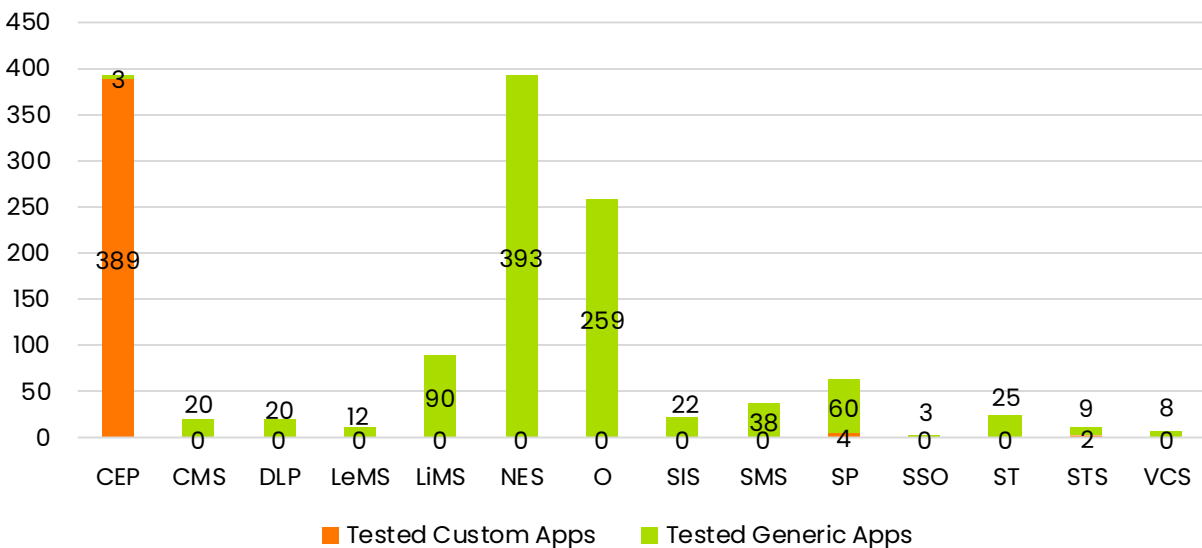


Figure 5.9 — Scored Apps by Category and Custom Vs. Generic



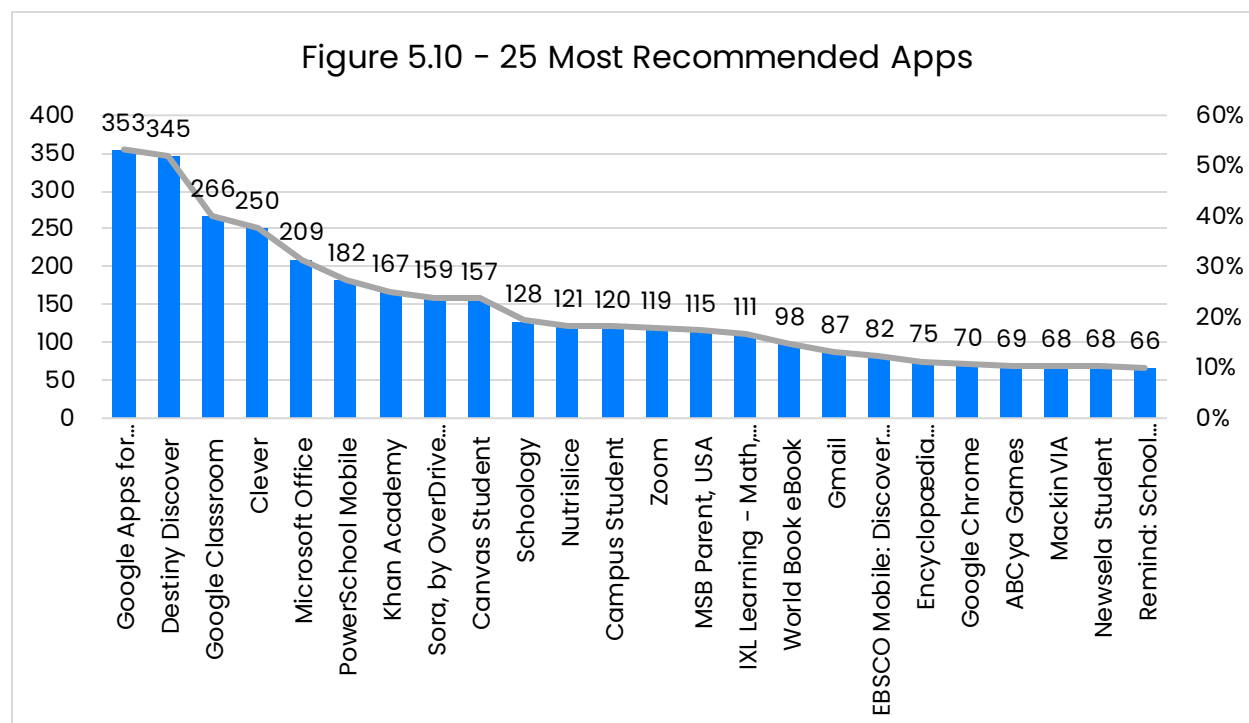
## 5.1.6 Most Recommended Apps

### 5.1.6.1 Most Recommended Apps Key Findings

- There is substantial **overlap** between the most frequently **recommended** technologies and the most frequently **required** technologies: **68%** of the top 25 most recommended apps also appear in the top 25 most required apps.
- The most recommended apps represent a broad distribution of app types, with the highest categories being NES, O and LiMS.
  - Because most CEP apps are custom apps named for the school, they don't appear in the most recommended apps, but they are among the most recommended at 39% of the schools providing custom apps.

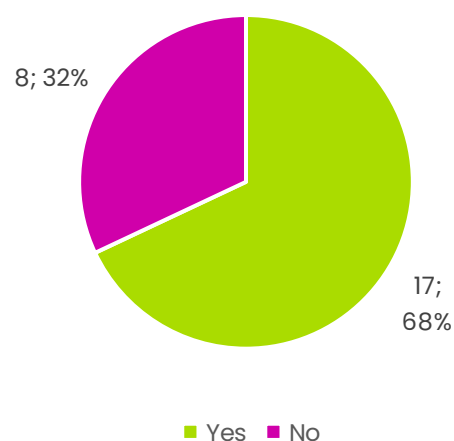


### 5.1.6.2 25 Most Recommended Apps



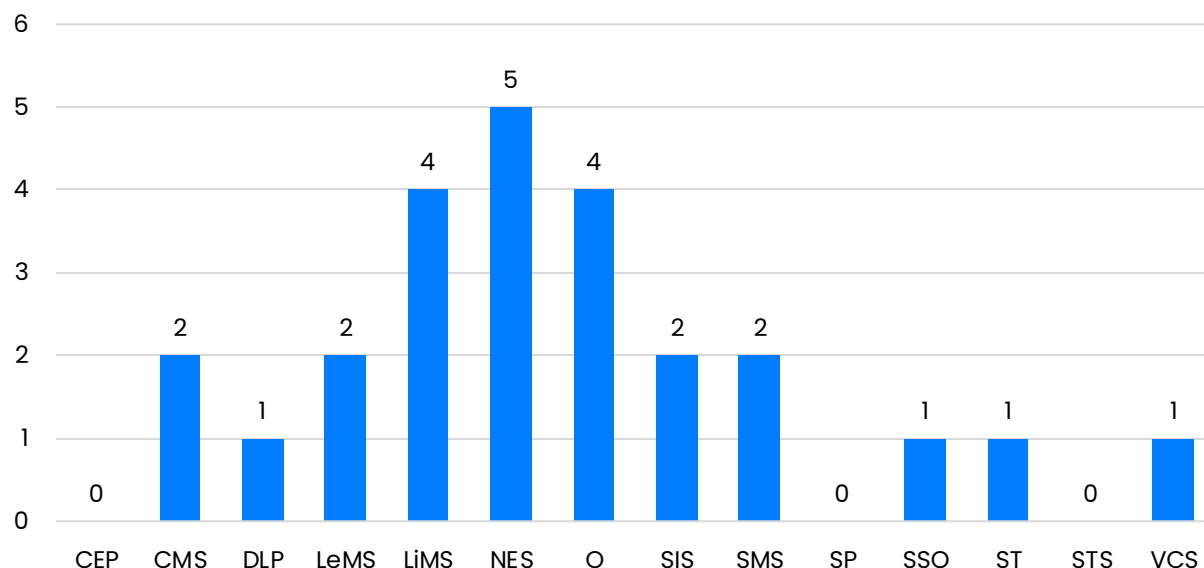
### 5.1.6.3 Overlap Between Most Recommended and Most Mandatory Apps

Figure 5.11 – % of Most Recommended Apps Also Most Required

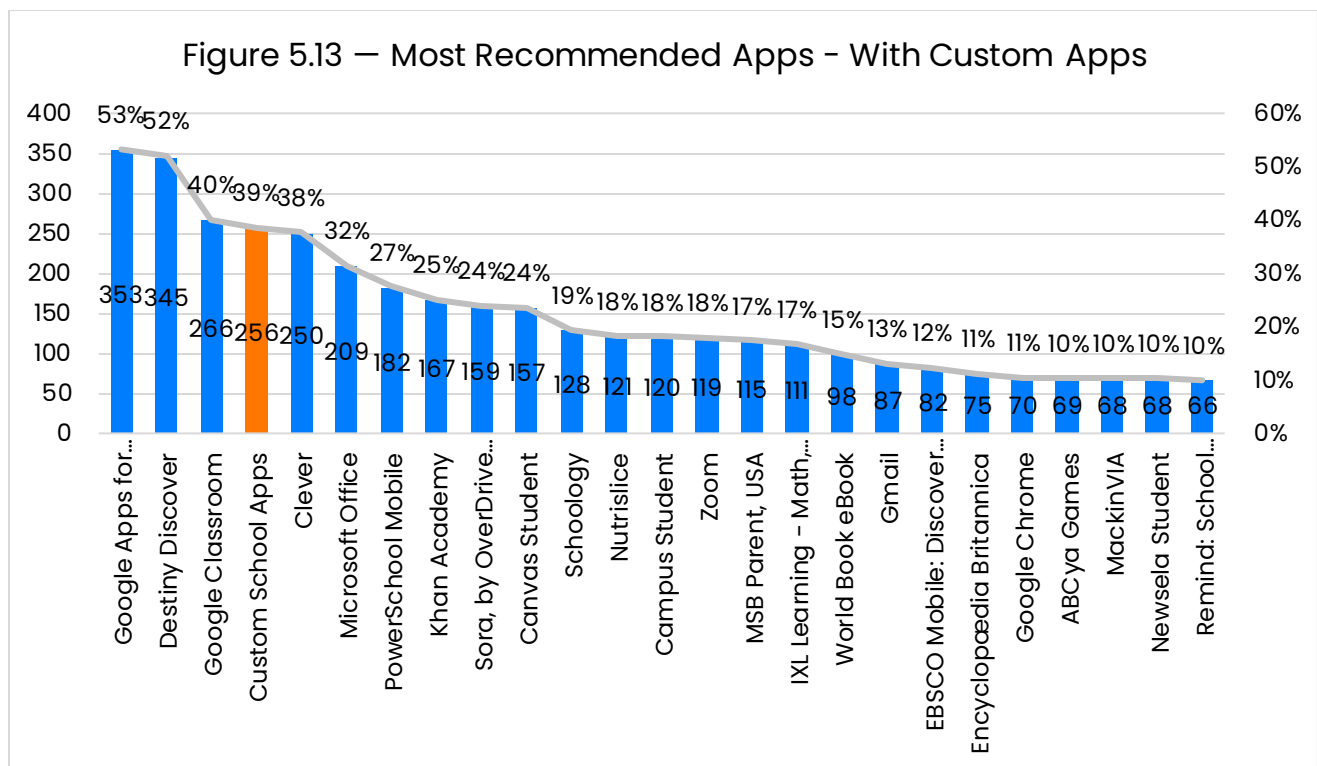


#### 5.1.6.4 Most Recommended Apps by Category

Figure 5.12 — 25 Most Recommended Apps by Category



The above Figure 5.12 points out a critical problem with looking at unique instances of apps in the data set. It looks like no CEP apps are recommended, but in fact, custom school apps (i.e. CEP apps) were among the most frequently recommended by schools. Since the apps all have unique names, they didn't make it into the most frequently recommended list. Figure 5.13 depicts the most frequently recommended list if we regard all CEP apps as a single app (Custom School Apps, with 256 occurrences, i.e. 39% of the schools had custom apps for students).



## 5.1.7 Most Frequently Required Apps

We designated certain apps as Mandatory or Key for a school if it met certain criteria (described in Section 7.2.1). Note that the schools do not typically specify a particular operating system (OS), so a mandatory app usually reflects both the iOS and the Android versions of the app. Note also that these are unconfirmed with the schools, so the data around the mandatory/key apps is directional in nature and not conclusive.

### 5.1.7.1 Key Mandatory App Findings

- PowerSchool Mobile, a Classroom Messaging Service type of technology, was the most frequently required at 28% of the sampled schools.
- Google Classroom, a Learning Management System, was second with 27% of all schools requiring it.
- Clever, a Single Sign On service, was third with 24% of schools requiring it.
- The top 25 mandatory/key apps represented a diverse range of edtech categories, no single category dominated, though School Management Software (SMS) was the highest with 4 apps in the top 25.
- Google developed the most apps in the top 25 required apps with five (5) apps.
- Microsoft was the only other developer with more than one app in the top 25 mandatory apps with two (2) apps.

- It's not surprising that Google and Microsoft apps were the most frequently mandatory, since many schools provide Gmail or Outlook accounts to students, as well as requiring the use of Google or Microsoft the productivity apps.

Figure 5.14 — Top 25 Mandatory/Key Apps

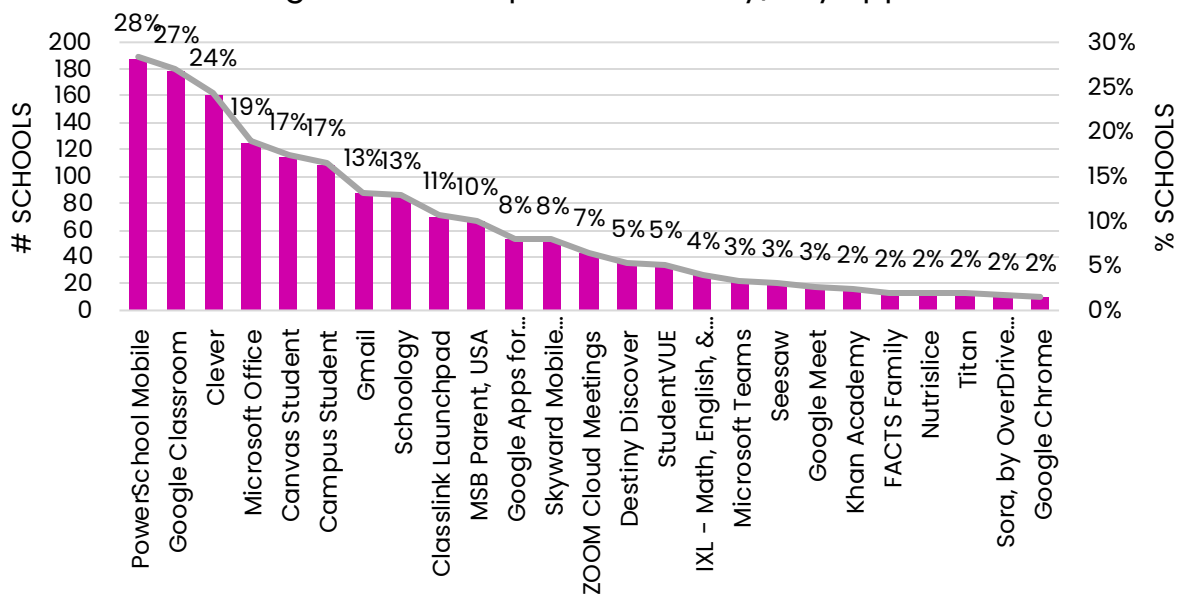
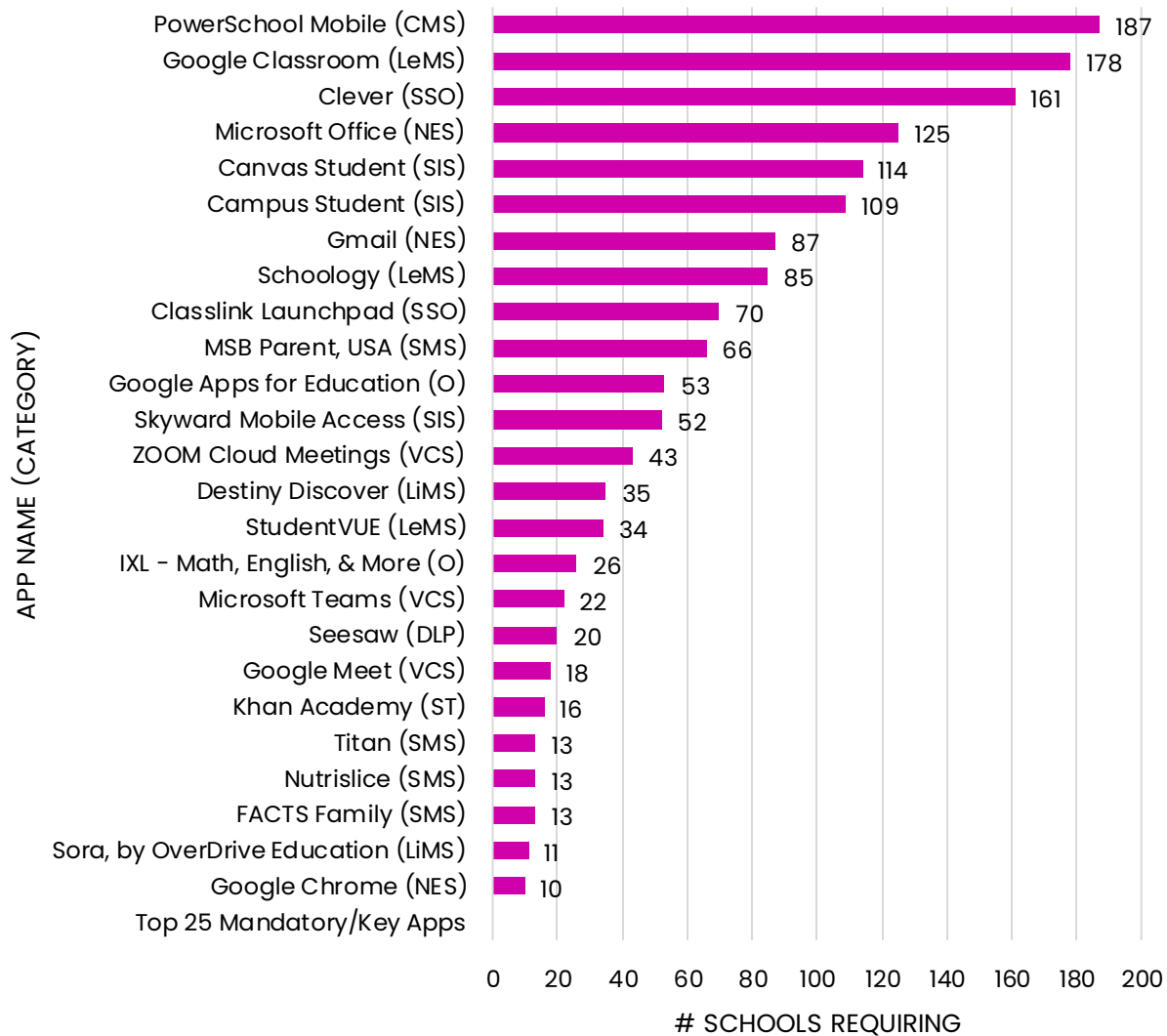
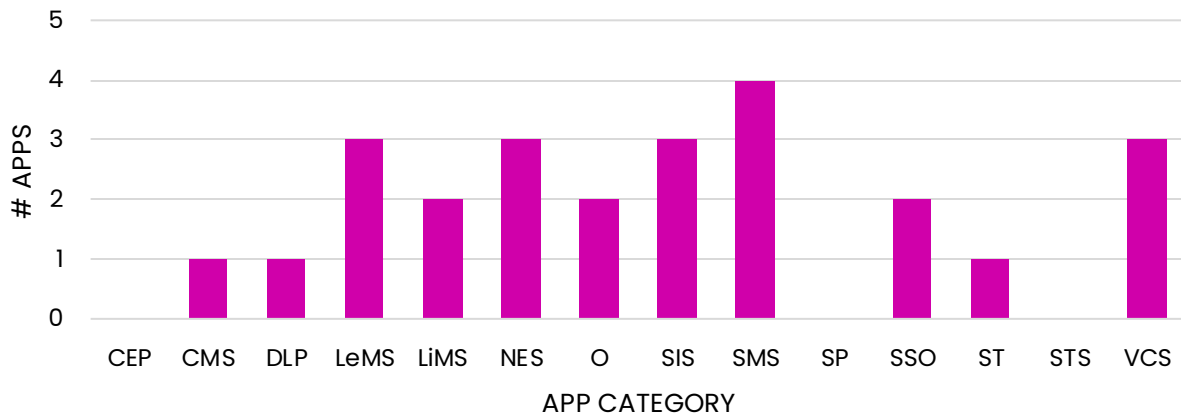


Figure 5.15 – Top 25 Mandatory/Key Apps



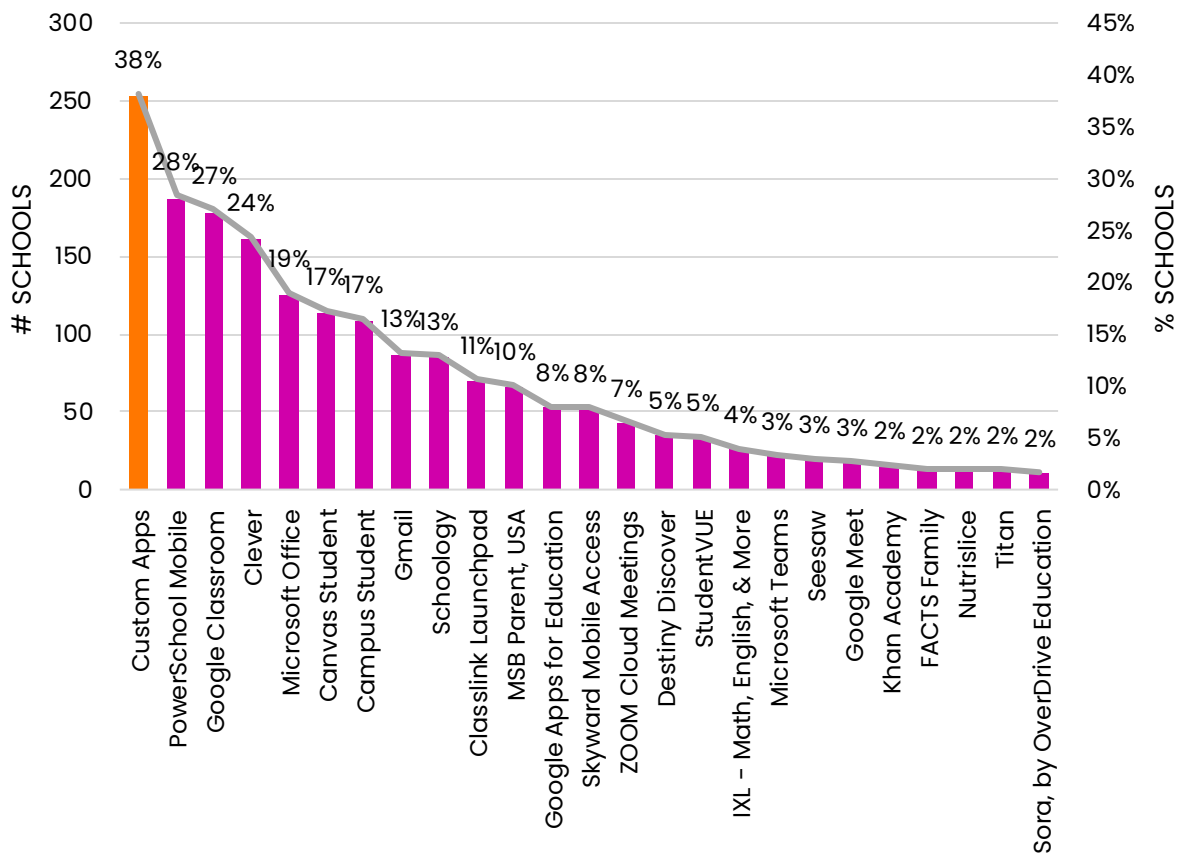
In general, there was a wide variety of edtech categories represented by the top 25 required apps (see table xxx below).

Figure 5.16 — Top 25 Mandatory/Key Apps by Category



Similar to Section 5.1.6.4 above, if we regard all the custom apps as a single app, they become the most frequently named mandatory or key app (see Figure 5.17).

Figure 5.17 — Top 25 Most Mandatory Apps - With Custom Apps



## 5.1.8 Number of Technologies Recommended by Schools to Students

In this research, we identified technologies recommended by schools through manual searching of the school and district websites. Occasionally, we would find lengthy lists of technologies recommended, and in some cases vetted and approved by the school or district. Some of these lists were quite long and we chose not to include all the apps contained in big lists in our sample. We did however keep track of the number of technologies contained in these lists.

### 5.1.8.1 School or District Technology Lists Key Findings

- For schools/districts that had aggregated lists of recommended technologies, the average number of technologies was a staggering 125 technologies.
- For schools/districts that provided lists of approved technologies, the average number of technologies listed was an even more jaw-dropping 172 technologies.
- We found one school with a list of approved technologies topping out at 1411 app (Mountain Phoenix Community School in Colorado).

**Table 5.4 School/District Technology Lists**

Type of List	# Schools	Average # Technologies	Max # of Technologies
Manual App Count	663	11	61
Simple Aggregated List	266	125	1411
Vetted/Approved Technology List	161	172	1411

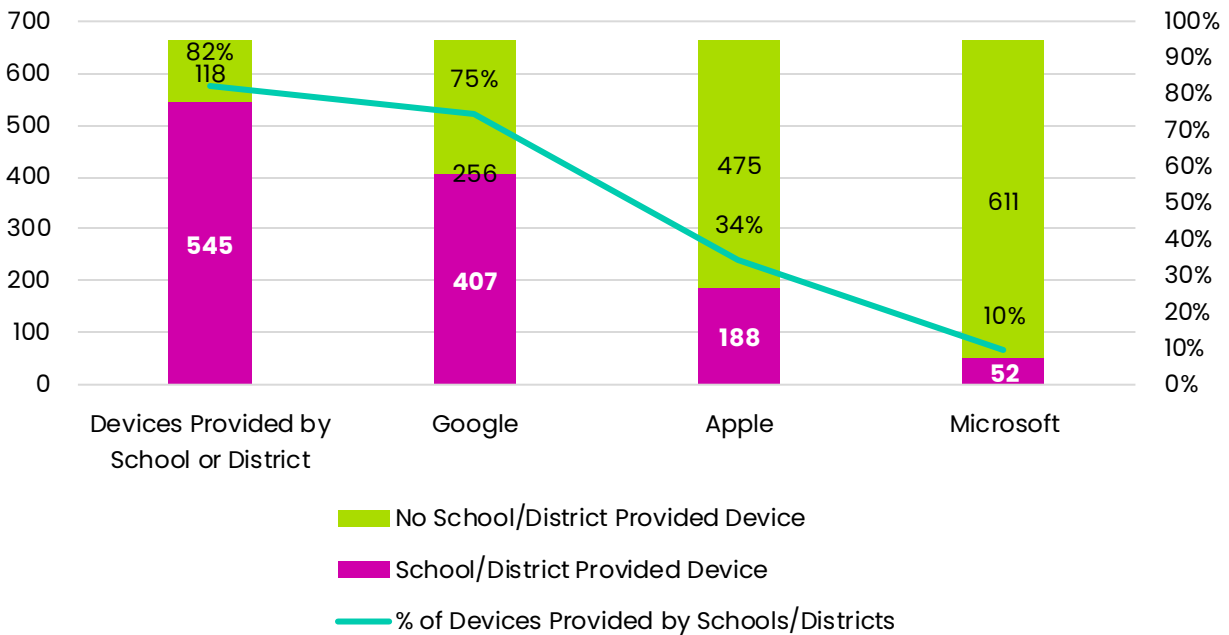
## 5.1.9 Devices

As part of this research, we identified if schools or districts were providing personal computing devices to students, and what type of devices were being provided.

### 5.1.9.1 Key Device Findings

- **82% of schools provided computing devices to students.**
- Of schools that provided devices **75% of them provided Chrome OS based devices** (shown as “Google” in Figure 5.18 below), **which was more than double the next closest devices, which were Apple based OS devices**, mostly iPads, especially to grades K-2.
  - We saw many schools issue iPads to grades K-2 and Chromebooks to grades 3-12.

Figure 5.18 — School/District Provided Computing Devices by OS Vendor



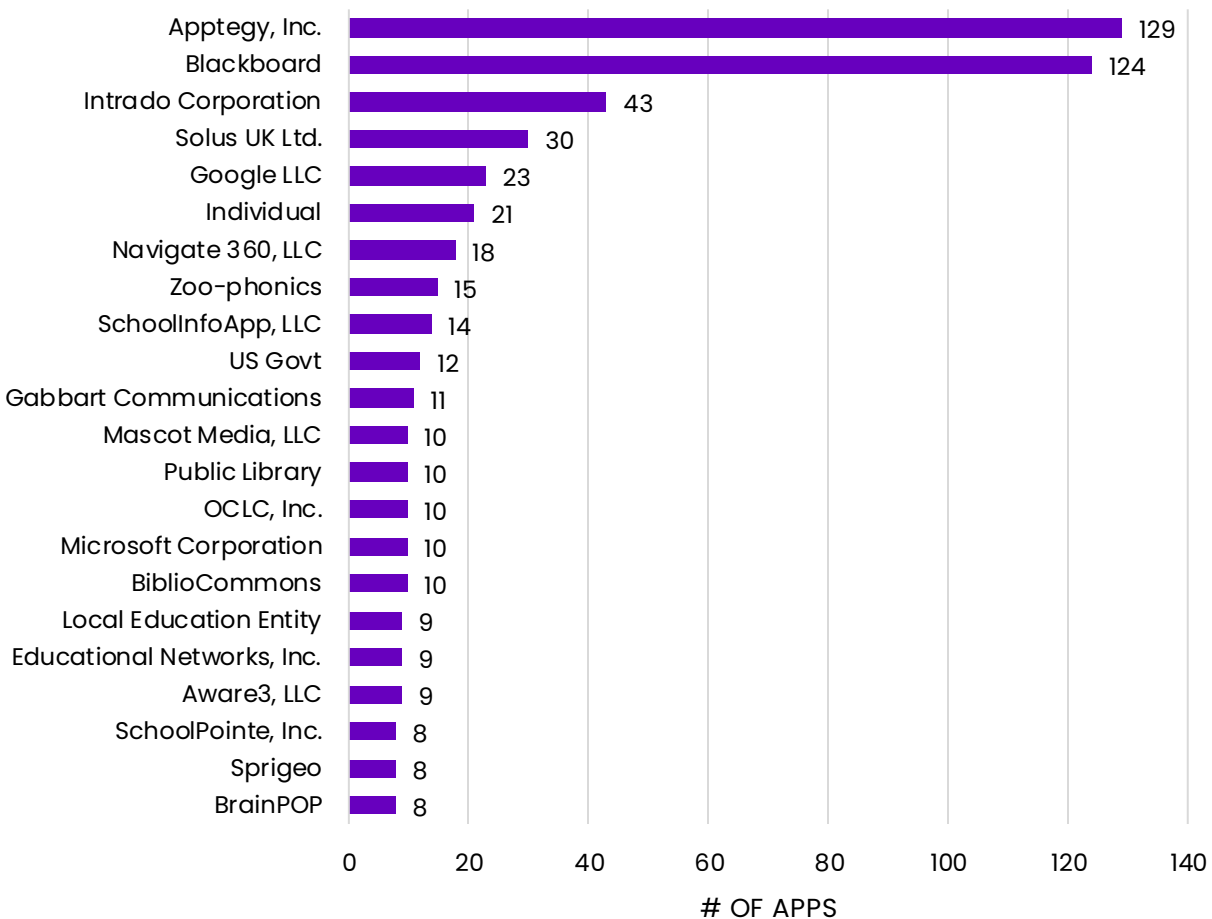
## 5.1.10 Developers

### 5.1.10.1 Developer Key Findings

- **The most common developers in the sample set were CEP type app developers, who occupied the top 3 places: Apptegy (129 apps), Blackboard (124 apps), and Intrado (43 apps).**
  - These were also the top three developers in the Custom apps.
- **In the Generic apps, the top three developers were: Solus (LiMS, 30 apps), Google (23 apps) and Navigate 360 (SP, 18 apps).**
- The frequency of developer in our sample set doesn't always indicate the most widely used apps. Take for instance Zoo-phonics (15 apps in our sample), which aren't nearly as popular as Google apps with respect to downloads.
- When we look at the most downloaded apps and developers in our sample, it's no surprise that Google, Microsoft and Amazon hold the top three positions.
- Google was the most popular developer of apps in both the most recommended and most required app lists, with 4 and 5 apps, respectively.



Figure 5.19 — Top 22 Most Common Developers



We analyzed the apps also by approximate number of downloads (derived from the information in the Google Play store). Figure 5.20 shows the developers with the most downloaded apps in our sample. The results are unsurprising, mainly due to the fact that some of the world’s most popular apps—which are not educational specific (such as YouTube)—are being recommended or required by schools.

Also important to note the vast difference in the volume of downloads between the most downloaded app (Gmail) and the first real edtech app in the top 28 most downloaded apps, Photomath (which received a safety score of Do Not Use, due to several risk factors, including the use of WebView and sending data to Facebook).

Figure 5.20 — Developers of Top 28 Most Downloaded Apps

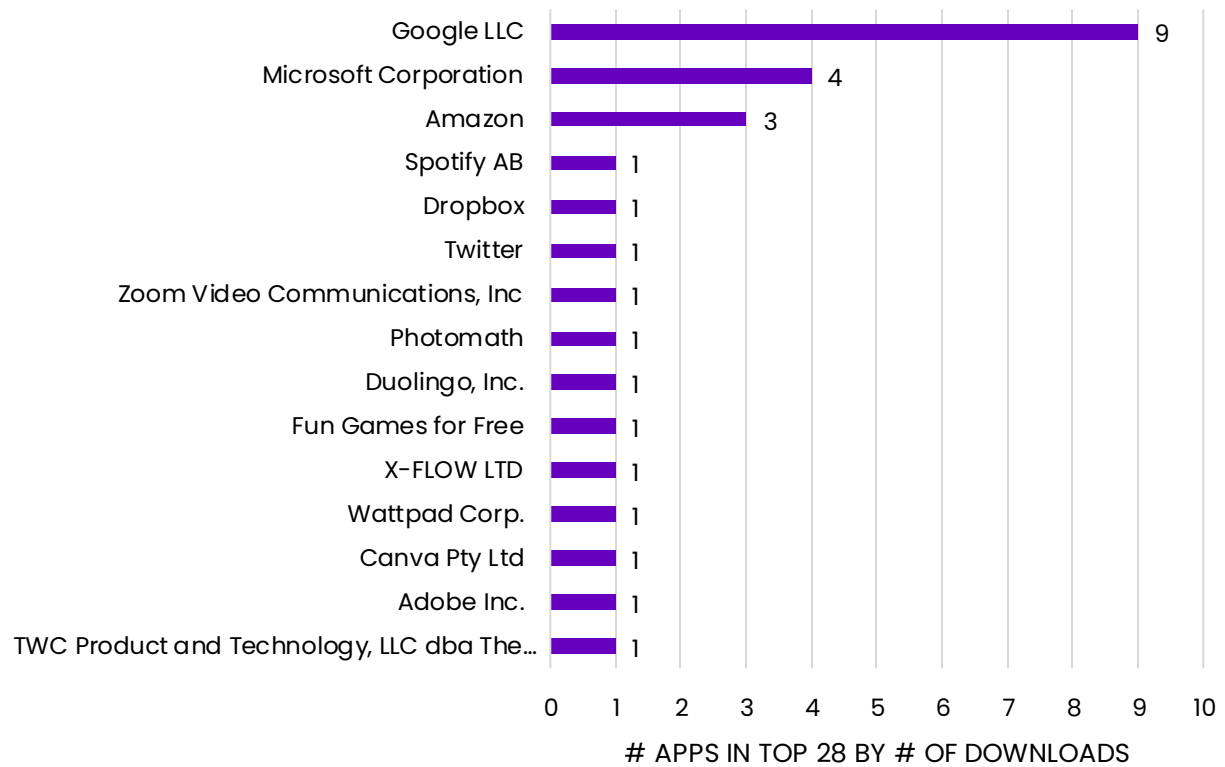
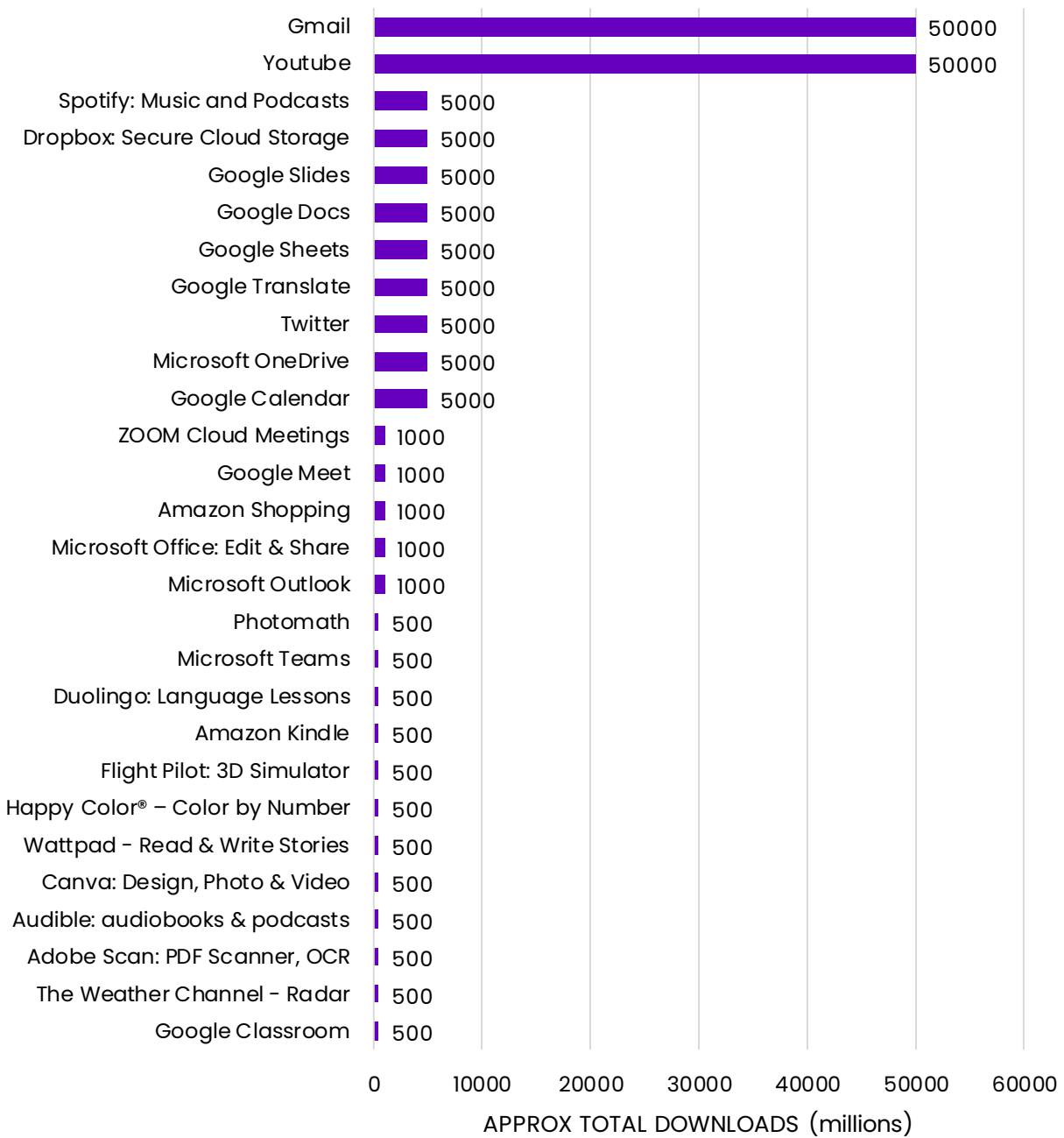
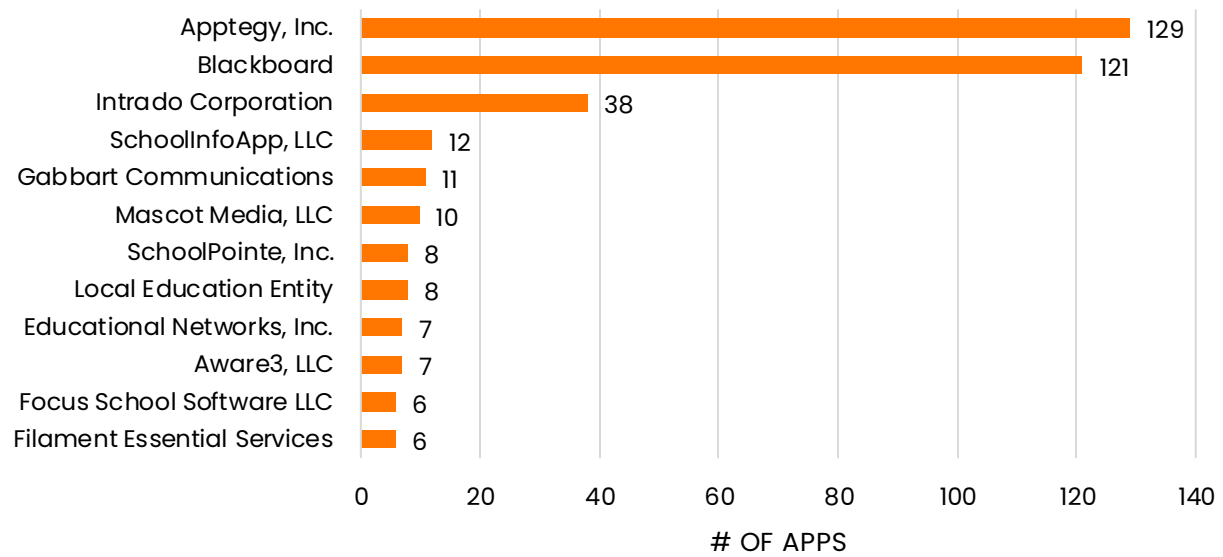


Figure 5.21 – Top 28 Most Downloaded Apps



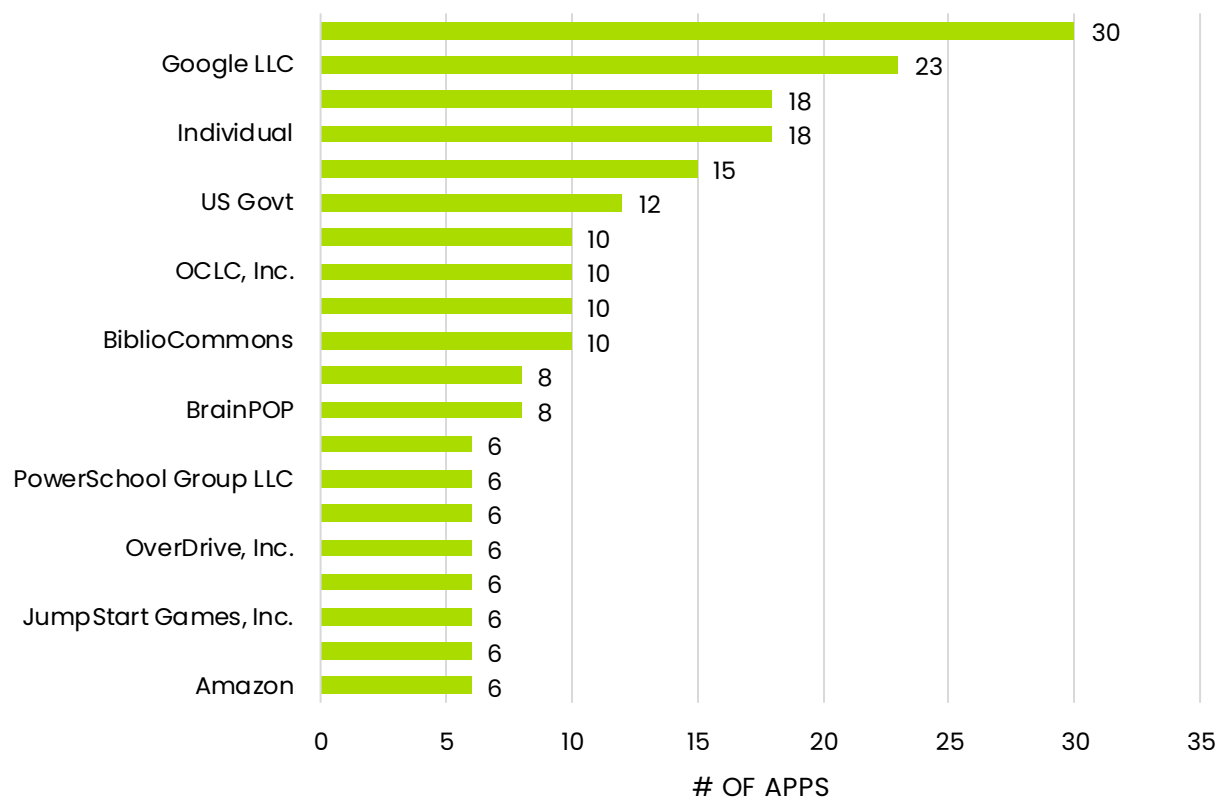
### 5.1.11 Custom App Developers

Figure 5.22 — Most Common Developers  
Custom Apps



### 5.1.12 Generic App Developers

Figure 5.23 — Top 20 Most Common Developers  
Generic Apps

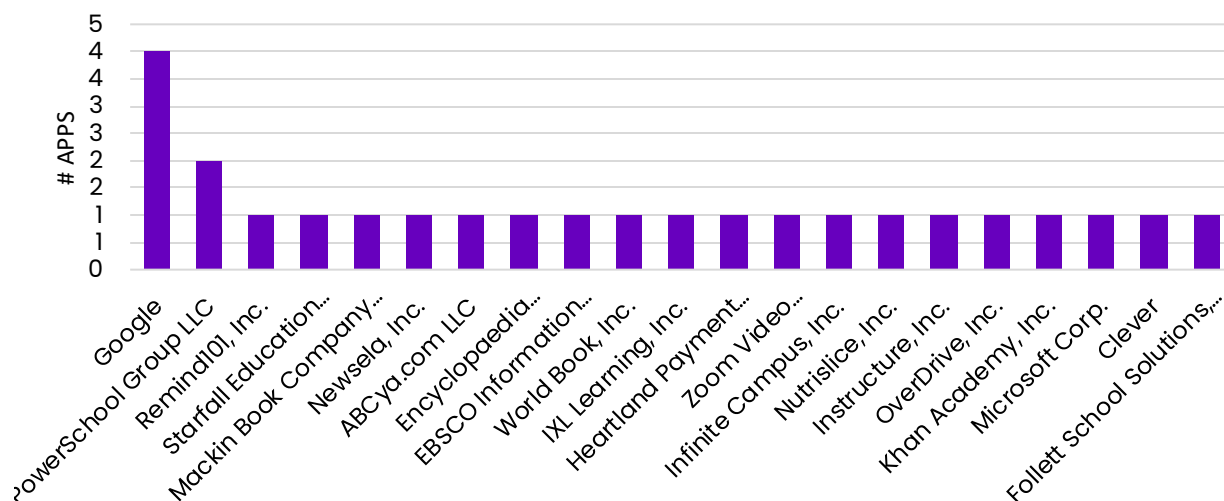


### 5.1.13 Developers By Edtech Category – See Appendix C

Appendix C contains lists of developers in the sample for each of the fourteen edtech categories.

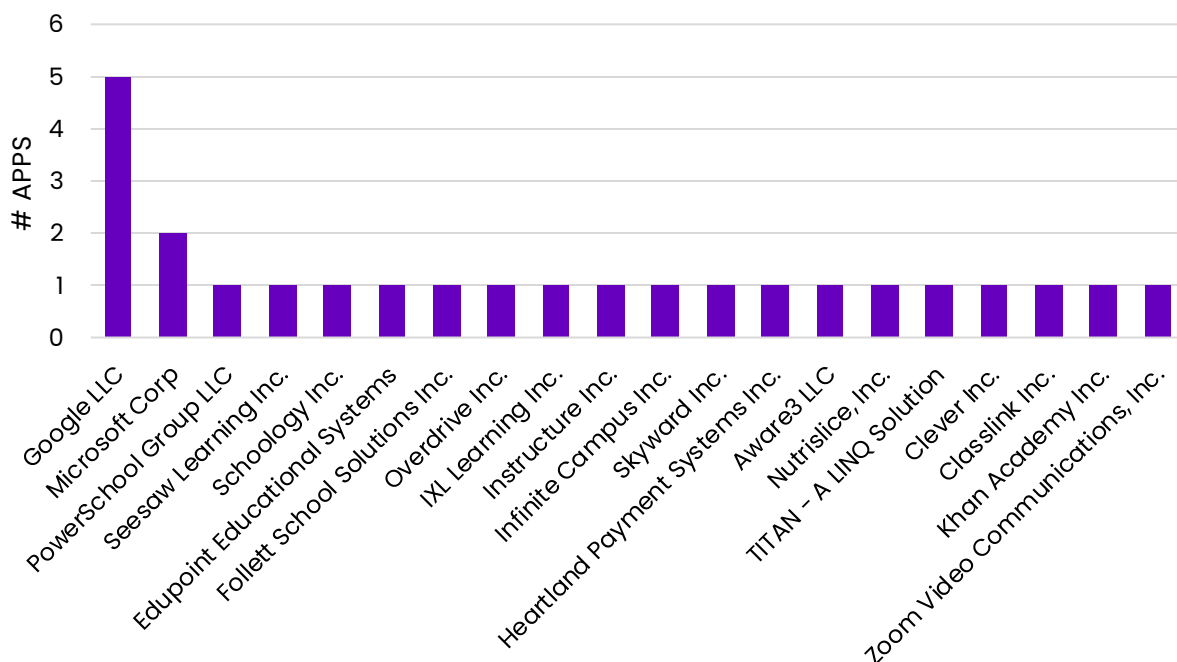
### 5.1.14 Most Recommended App Developers

Figure 5.24 — Top 25 Recommended Apps by Developer



### 5.1.15 Most Mandatory/Key App Developers

Figure 5.25 — Top 25 Mandatory/Key Apps by Developer



## 5.2 App Safety Score Analysis

This section examines the ISL Safety Scores assessed for all the scored apps in the sample (1357 apps).

### 5.2.1 App Safety Score Key Findings

- **78%** of all tested apps rated **Do Not Use**, and **18%** rated **High Risk**.

- Only **4%** rated our safest score, **Some Risk**.
- **No (0) Custom** apps were rated our safest score, **Some Risk** and **89%** of **Custom** apps were rated **Do Not Use**.
- **Android** apps were somewhat **safer** than **iOS** apps, but both had tiny fractions of apps that were relatively safe for students at 5% and 3% respectively.
  - **80%** of **iOS** apps were rated **Do Not Use** compared to **76%** of **Android** apps.
- **Most recommended apps:** of the apps tested, **86%** rated **Do Not Use**, **9%** were **High Risk**, and only one app (**5%**) **Some Risk**.
- **Most frequently mandatory/key apps:** **None** of the apps in the most frequently required apps scored our safest score, **Some Risk**. **74%** rated **Do Not Use** and **26%** rated **High Risk**.

## 5.2.2 Safety Scores – All Tested Apps

Figure 5.26 – Apps by App Score – All

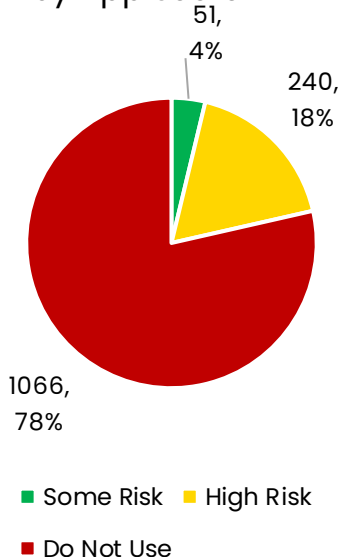


Figure 5.27 – Apps by App Score – Custom

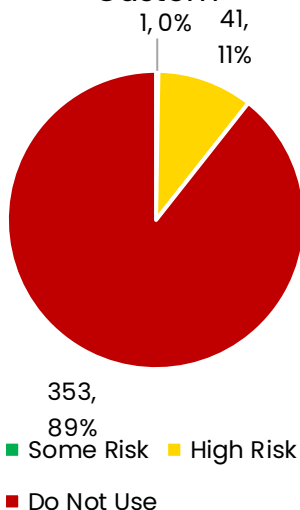


Figure 5.28 – Apps by App Score – Generic

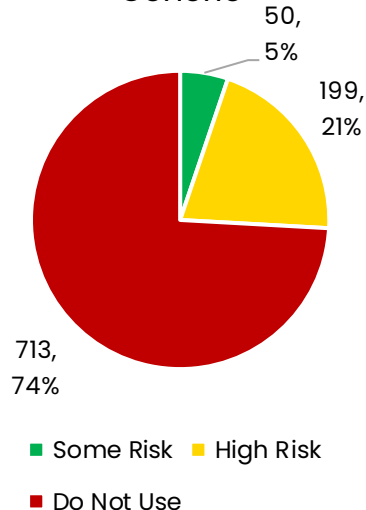
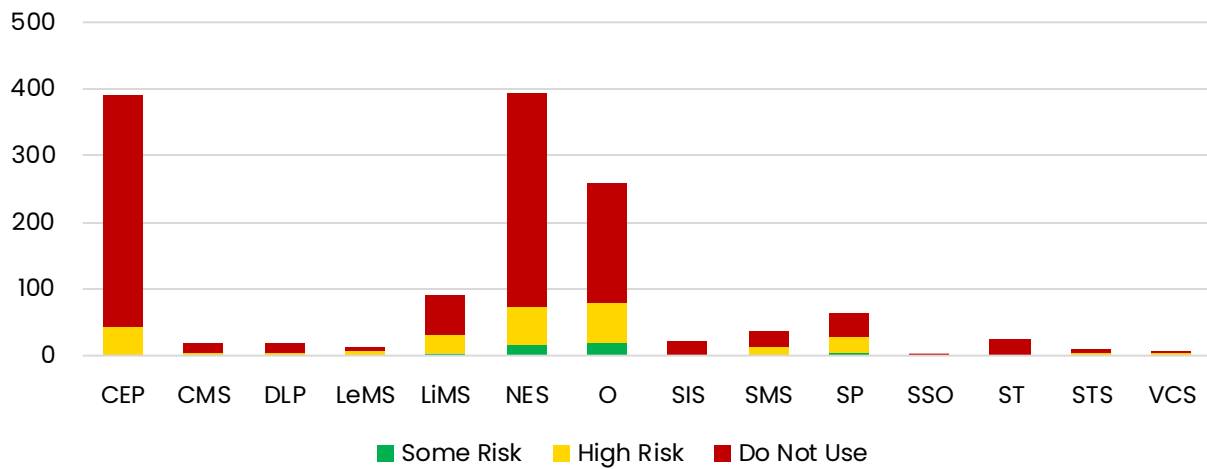


Figure 5.29 — App Scores by App Type



### 5.2.3 App Safety Scores by OS

Figure 5.30 — Apps by App Score - iOS

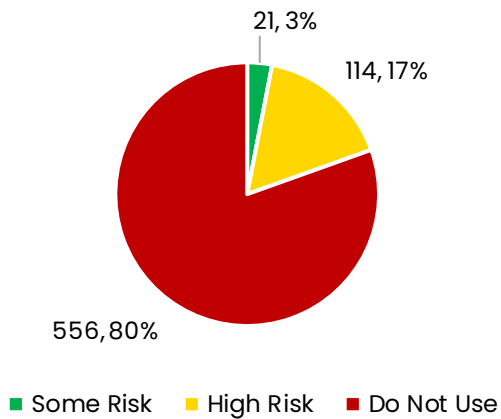
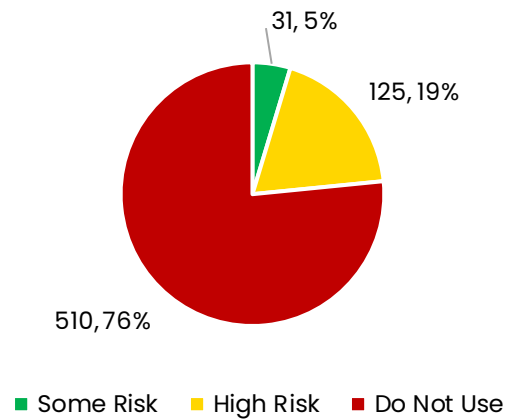


Figure 5.31 — Apps by App Score - Android





## 5.2.4 App Scores by Most Recommended and Most Required

Figure 5.32 — 25 Most Recommended Apps

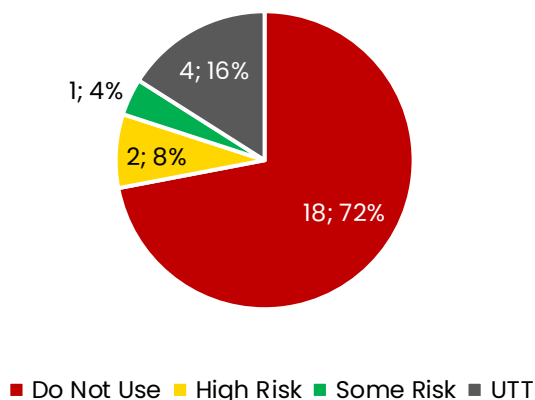


Figure 5.33 — 25 Most Recommended Apps - Tested

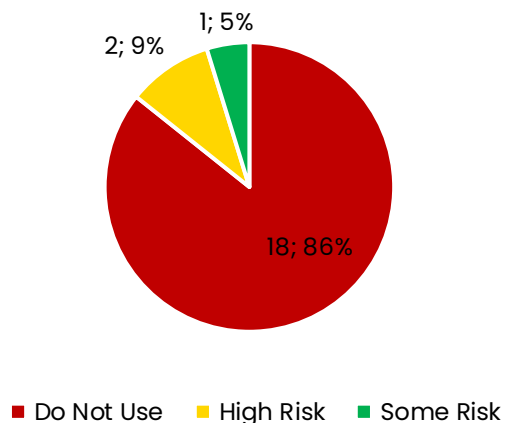


Figure 5.34 — Top 25 Mandatory/Key Apps

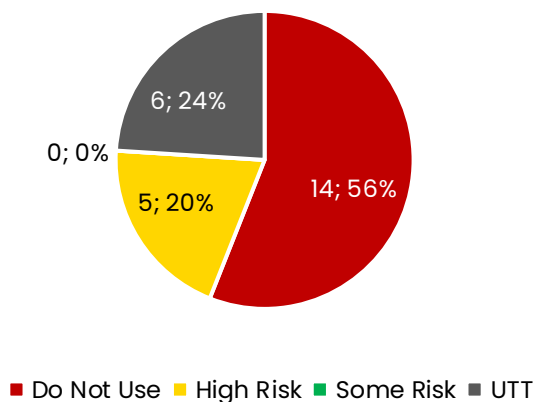
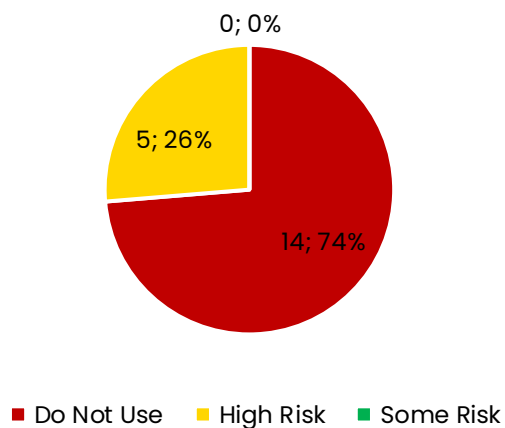


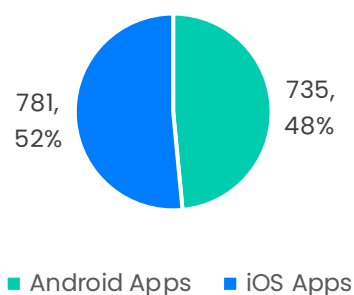
Figure 5.35 — Top 25 Mandatory/Key Apps - Tested



## 5.3 SDK Analysis

Of the 1722 list of apps, we were able to obtain SDK information for 1516 of the apps. This section examines the SDKs in use by those 1516 apps. Of the 1516 apps analyzed, 52% were iOS and 48% were Android.

## Apps in SDK Analysis – by OS



### 5.3.1 SDK Key Findings

- SDKs found in sample:
  - **28%** of the SDKs used in the apps were **Medium or Neutral risk**.
  - **72%** of the SDKs used in the apps were **High or Very High-Risk**.
  - **57%** of the SDKs used in the apps were Very High-Risk, meaning they were advertising or monetization related SDKs.
  - The **Google** Firebase analytics SDK was the most frequently used SDK by apps, appearing **in 67% of all apps with SDKs**.
  - The top 5 SDKs used by apps were **Google** SDKs.
- **94%** of apps have at least **one SDK**.
- Apps with SDKs averaged **9.3 SDKs** per app. That's potentially ten external entities per app.
  - Apps with SDKs averaged **4.4 Very High Risk** SDKs per app.
  - Apps with SDKs averaged **1.6 High Risk** SDK per app.
  - Apps with SDKs averaged **2.1 Medium Risk** SDK per app.
- **76.5%** of all apps included **Very High Risk** SDKs.
  - **81.6%** of apps with one or more SDK included **Very High Risk** SDKs.
- **81.3%** of all apps included **High Risk** SDKs.
  - **86.7%** of apps with one or more SDK included **High Risk** SDKs.
- **66%** of apps included one or more **Google SDK**, compared to **36%** of the apps including one or more **Apple** SDK.
  - Note that this is partially due to the fact that while iOS apps can and do include Google SDKs, Google apps do *not* include Apple SDKs.
    - **52.7%** of **iOS apps** included **Google** SDKs.
    - **82.6%** of **Android apps** included **Google** SDKs.
- Custom vs. Generic apps:
  - Custom apps were more risky than generic apps. We'd like to see a much bigger difference between the behavior of custom school apps and the generic apps.

- **Custom** apps average **9.9 SDKs** compared to **9.0 SDKs** for **Generic** apps.
  - **Custom** apps averaged 5.3 **Very High Risk** SDKs per app compared to **4.1** for **Generic** apps.
- **86.6%** of Custom apps with SDKs had **Very High Risk** SDKs compared to **79.8%** of **Generic** apps.
- **98.6%** of **Custom** apps with SDKs had **High Risk** SDKs compared to **82.8%** of **Generic** apps.
- iOS vs. Android:
  - Similar to Spotlight Report #1 findings, **Android apps consistently have more and higher risk SDKs than iOS apps.**
    - **Android** apps average **10.8** SDKs compared to iOS apps' 7.8
    - **Android** apps average **6.5 Very High Risk** SDKs, nearly three times as many as **iOS** apps' **2.4**.
  - **89.9%** of **Android** apps included **Very High Risk** SDKs as compared to **63.6%** of **iOS** apps.
  - **84.1%** of Android apps include **High Risk** SDKs, compared to iOS apps' **78.6%**.
  - **iOS** apps include more **Medium Risk** SDKs (**80.0%**) than **Android** with **72.1%**.
  - **70%** of all apps included Google SDKs, compared to **38%** of apps including Apple SDKs.
    - **56.9%** of **iOS apps** included **Google SDKs**, but **Android apps** never included **Apple SDKs**.
  - **iOS** apps were more likely to have zero (0) SDKs than Android apps with **68%** of the apps with no SDKs.
- Most recommended apps:
  - The average number of SDKs found in the most recommended apps was **somewhat higher** at **9.2** per app than for the overall data set at **8.7** SDKs per app.
  - The average numbers of SDKs by risk category in the most recommended apps were slightly better (lower) than for the overall data set.
- Most frequently mandatory apps:
  - The average number of SDKs found in the most frequently mandatory apps were **somewhat higher** at **9.3 per app** than for the overall data set, at **8.7**.
  - However, the average number of **Very High Risk** SDKs was lower at **3.0** than the overall data set at **4.1**.

### 5.3.2 SDKs Found in Apps by Risk Score

This section shows the breakdown of the SDK Risk Scores for the SDKs found in the apps, and also within the Custom and Generic apps.

Figure 5.36 — SDK Count Across All Apps

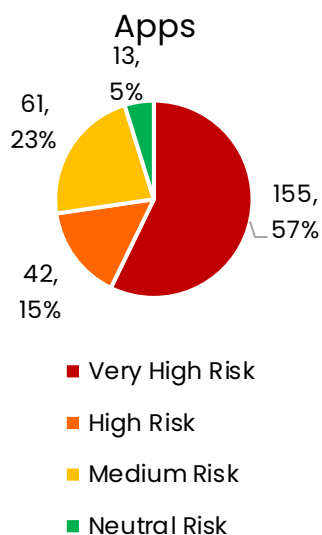


Figure 5.37 — SDK Count - Custom Apps

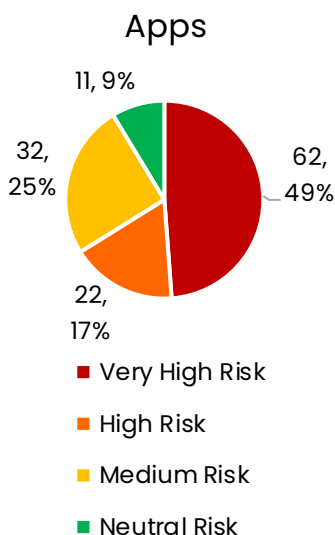
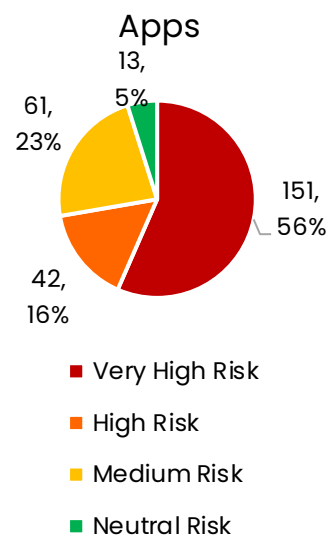


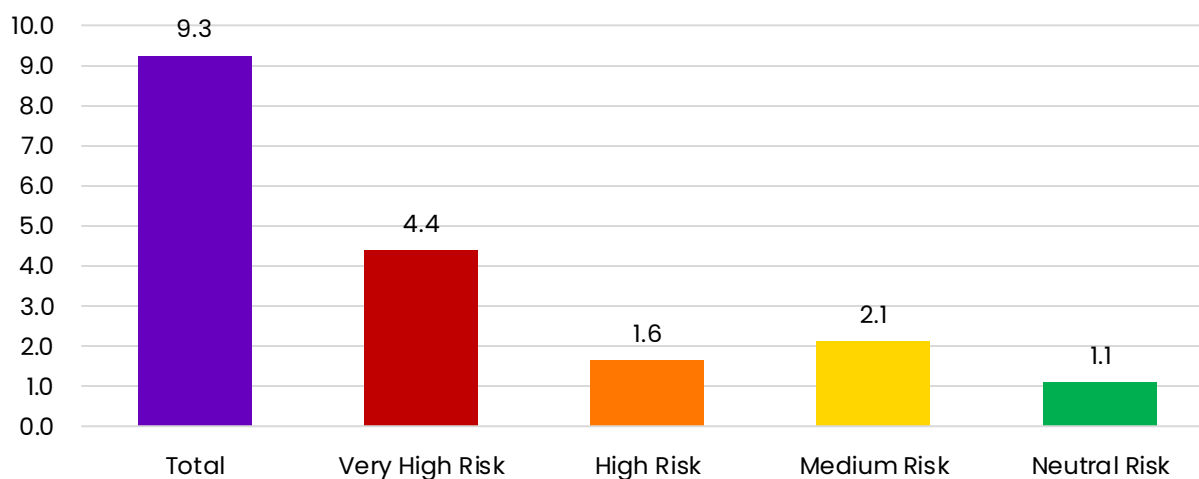
Figure 5.38 — SDK Count - Generic Apps



### 5.3.3 Average Number of SDKs per App

Apps with at least one SDK averaged 9.3 SDKs. This is somewhat lower than the average of 10.6 SDKs reported in Spotlight Report #1 but is expected since the apps in Spotlight Report #1 were all Custom/CES apps, which had an average of 9.9 SDKs per app in this benchmark (see Figure 5.41).

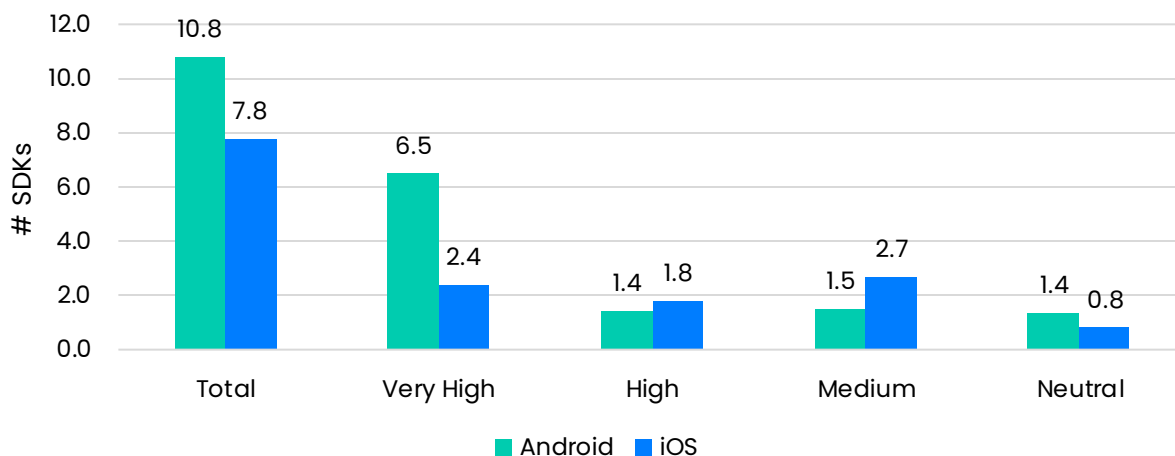
Figure 5.39 — Average # of SDKs in All Apps



### 5.3.3.1 Average Number of SDKs per App by OS

Similar to Spotlight Report #1 findings, Android apps have more SDKs in general than iOS apps, and 2.7 times as many Very High Risk SDKs than iOS apps on average. iOS apps, however, have somewhat more High and Medium Risk SDKs than Android apps.

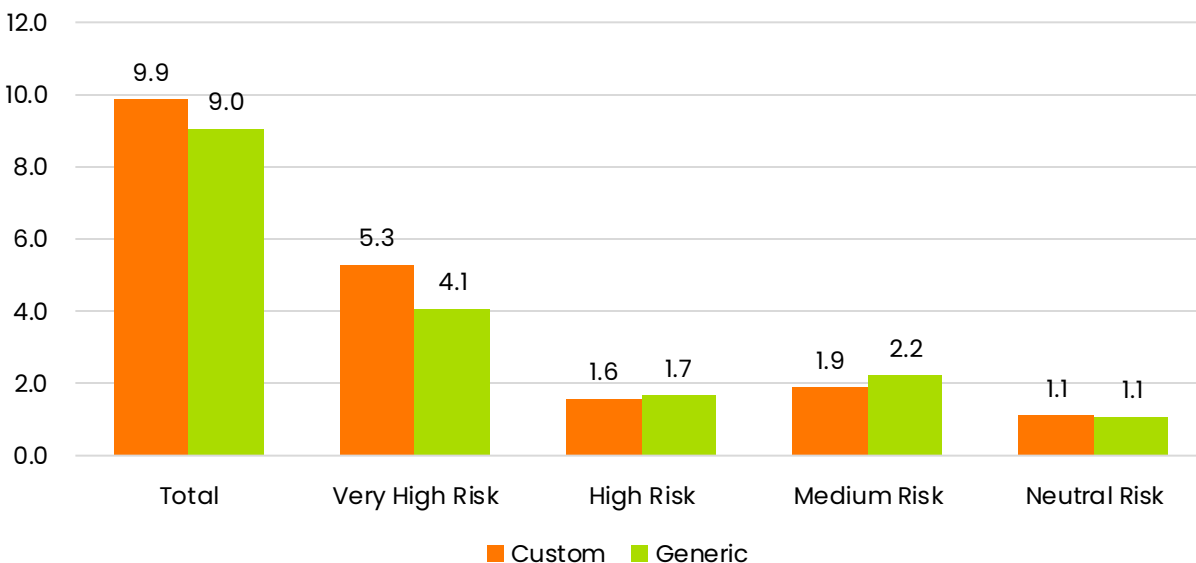
Figure 5.40 — Average # of SDKs - By OS



### 5.3.3.2 Average Number of SDKs per App by Generic vs. Custom

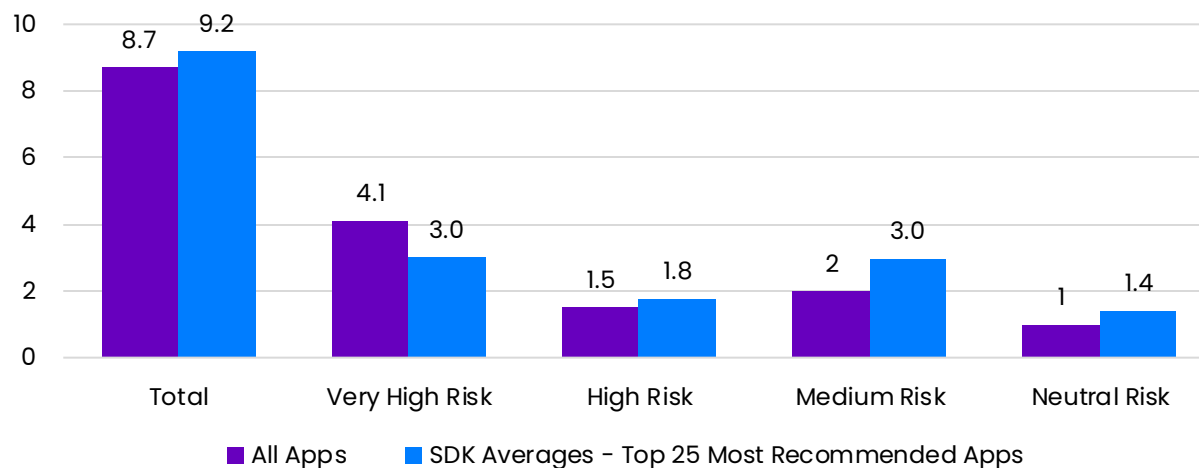
Custom apps have somewhat more SDKs on average than Generic apps. Similarly, Custom apps have on average more Very High Risk SDKs than generic apps.

Figure 5.41 — Average # SDKs - Custom/Generic



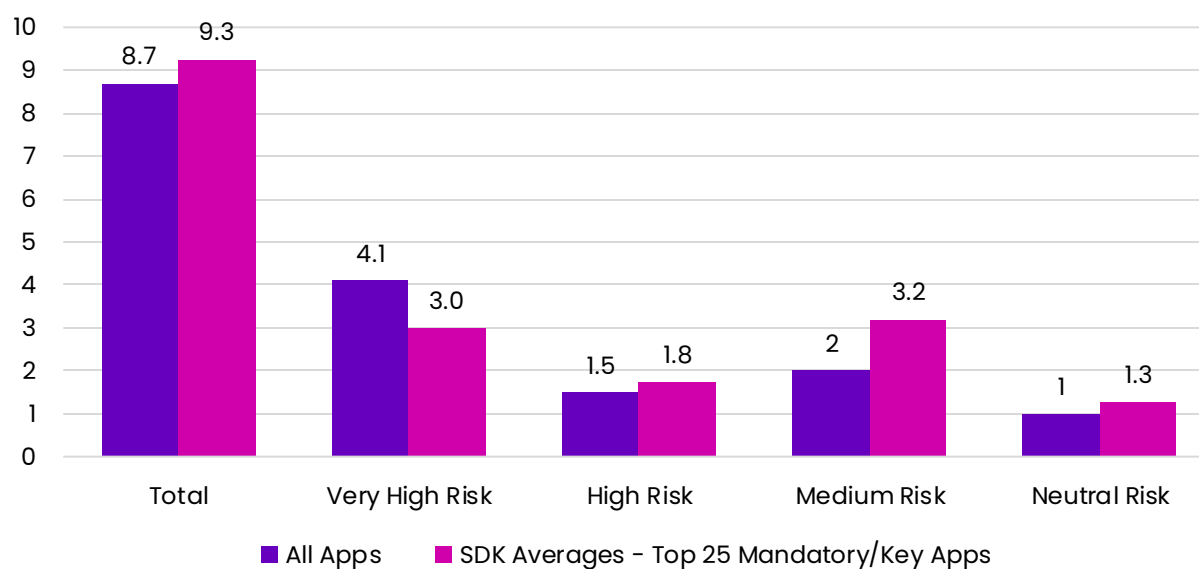
### 5.3.3.3 Average Number of SDKs Most Recommended Apps

Figure 5.42 — SDK Averages - 25 Most Recommended Apps



### 5.3.3.4 Average Number of SDKs Most Mandatory Apps

Figure 5.43 — SDK Averages - Top 25 Mandatory/Key Apps



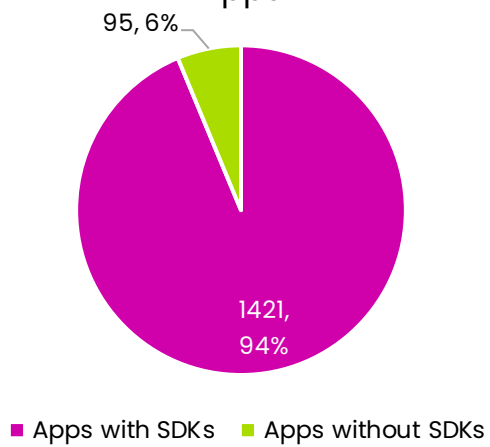
## 5.3.4 Apps with No SDKs

### 5.3.4.1 Apps with No SDKs Key Findings

- 94% of the apps studied have at least 1 SDK.
- 68% of the apps with no SDKs were iOS apps.

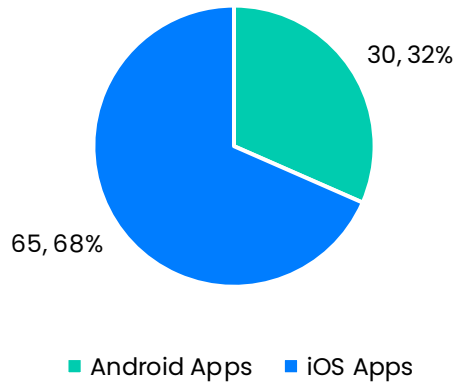
### 5.3.4.2 Apps with/without SDKs

Figure 5.44 — SDK Usage in Apps



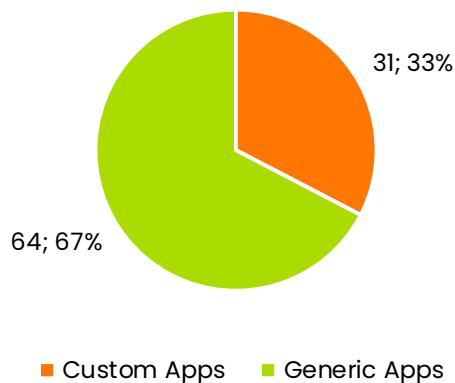
### 5.3.4.3 Apps with No SDKs by OS

Figure 5.45 — All Apps with no SDKs - By OS



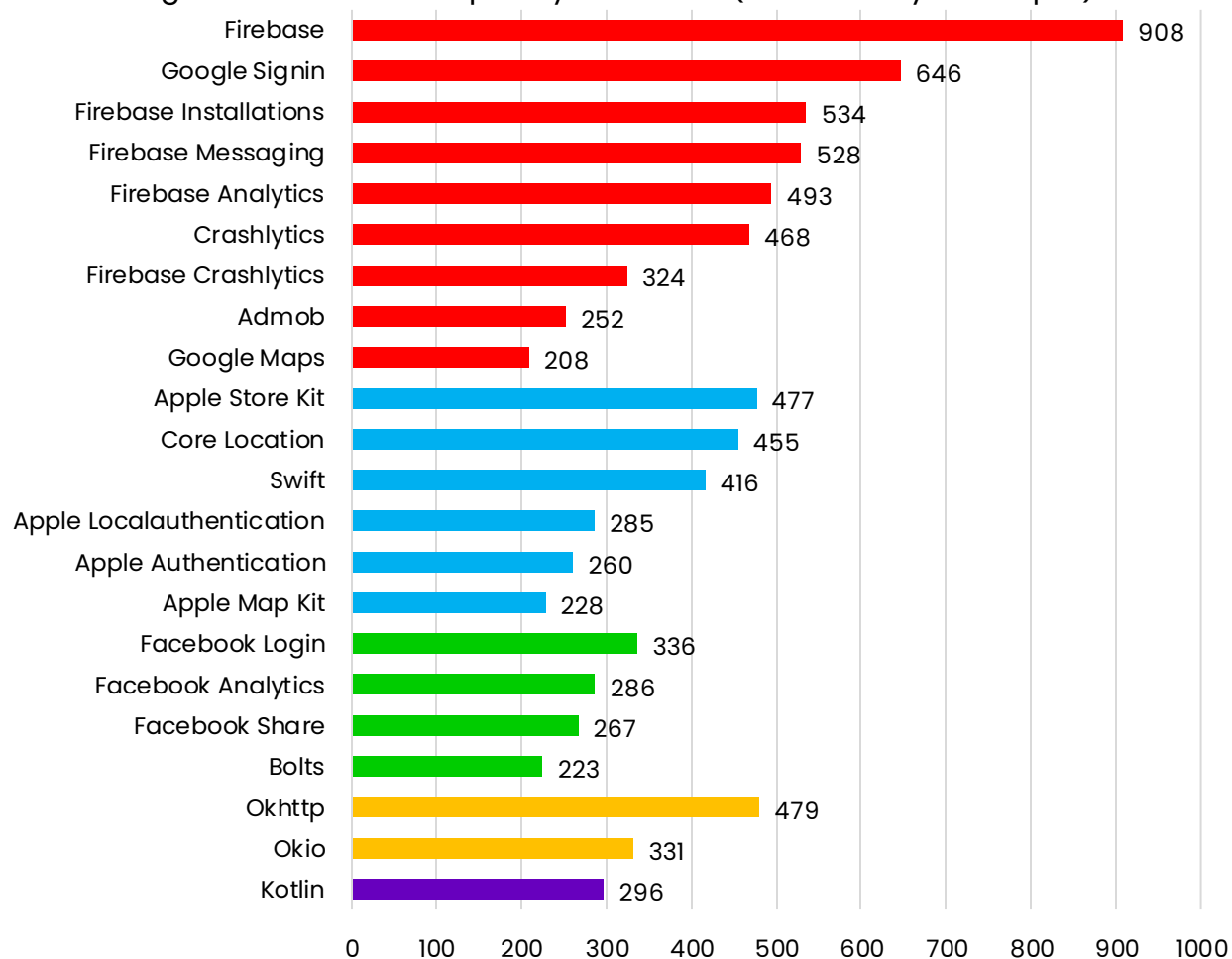
#### 5.3.4.4 Apps with No SDKs – Custom vs. Generic

Figure 5.46 – Apps without SDKs – By Custom/Generic



#### 5.3.5 Most Frequently Used SDKs (Clustered by Developer)

Figure 5.47 – Most Frequently Used SDKs (clustered by Developer)





## 5.3.6 Google and Apple SDKs

### 5.3.6.1 Apps with Google or Apple SDKs

- 70% of all the apps included Google SDKs, compared to 38% of all apps included Apple SDKs. This is mainly attributable to the fact that Android apps never include Apple SDKs, but Apple apps often include Android SDKs.
- 56.9% of the iOS apps in the sample included Google SDKs, and none of the Android apps included Apple SDKs.

Figure 5.48 — Apps Containing Google SDKs

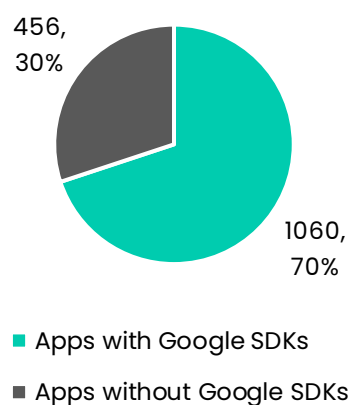


Figure 5.49 — Apps Containing Apple SDKs

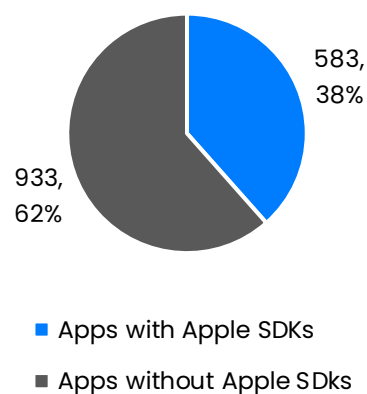


Figure 5.48a — Apps with Google SDKs by OS

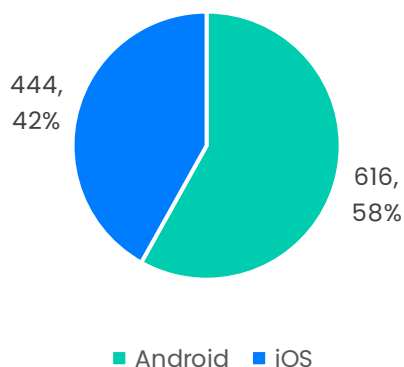
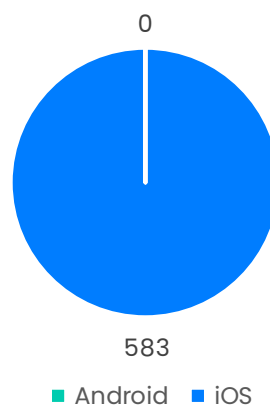


Figure 5.49a — Apps with Apple SDKs by OS



### 5.3.6.2 Apps with Google or Apple SDKs by OS and Custom vs. Generic

Figure 5.50 — Apps with Google SDKs

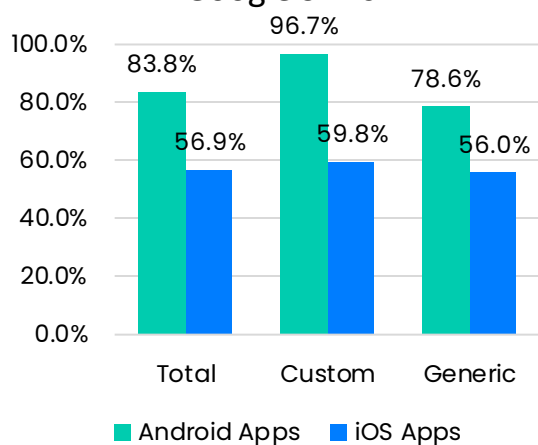
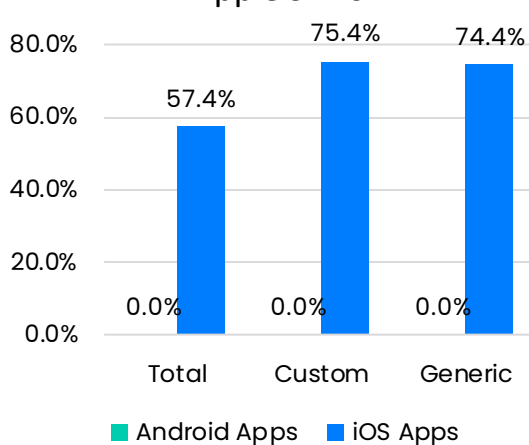


Figure 5.51 — Apps with Apple SDKs



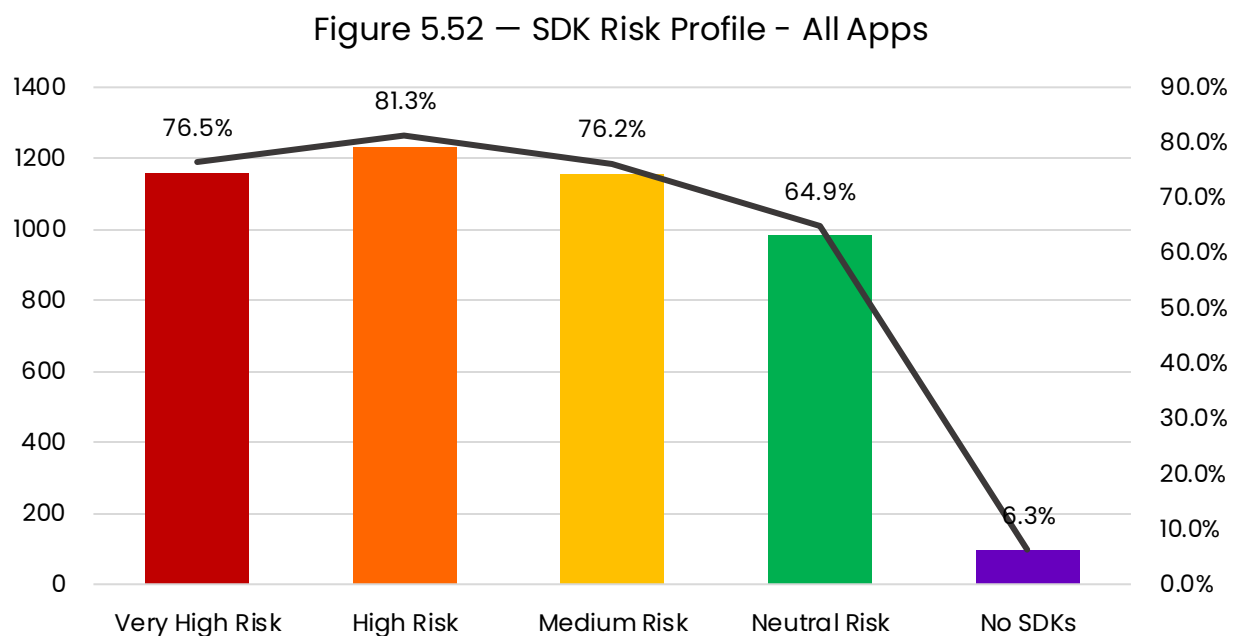
### 5.3.7 SDK-based App Risk Profile Analysis

This section analyzes the risk profiles of apps that include SDKs. A risk profile is the overall percentages (likelihood) of SDKs by risk category for a given population of apps.

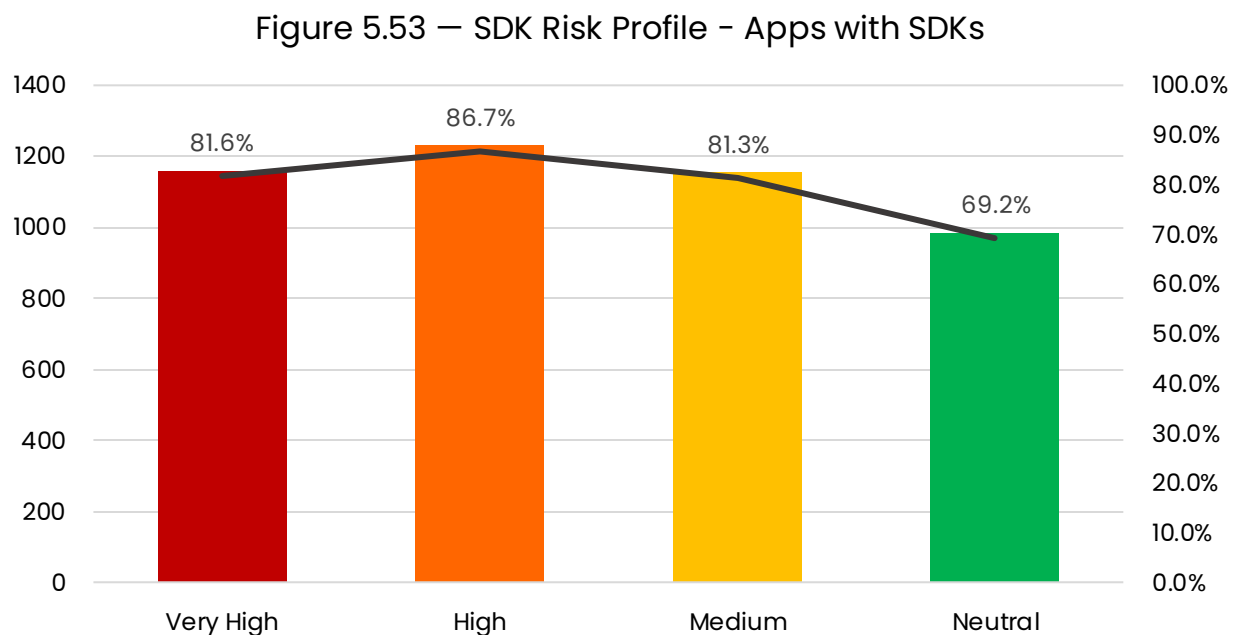
#### 5.3.7.1 SDK-based App Risk Profile Key Findings

- **81.6%** of apps that had one or more SDK included **Very High Risk** SDKs.
- **86.7%** of apps that had one or more SDK included **High Risk** SDKs.
- Only **6.3%** of apps had **no** SDKs.
- Custom apps were somewhat more risky than Generic apps.
  - **86.6%** of **Custom** apps with SDKs had **Very High Risk** SDKs compared to **79.8%** of **Generic** apps.
  - **98.6%** of **Custom** apps with SDKs had **High Risk** SDKs compared to **82.8%** of **Generic** apps.
- **Android** apps were **significantly riskier** than **iOS** apps.
  - **89.9%** of **Android** apps include **Very High Risk** SDKs, compared to **iOS** apps' **63.6%**.
  - **84.1%** of **Android** apps include **High Risk** SDKs, compared to **iOS** apps' **78.6%**.
  - **iOS** apps include more **Medium Risk** SDKs (**80.0%**) than **Android** with **72.1%**.
- The most recommended apps were somewhat worse (higher) than the overall sample.
- The most frequently mandatory apps were also somewhat worse than both the most recommended apps and the overall sample.

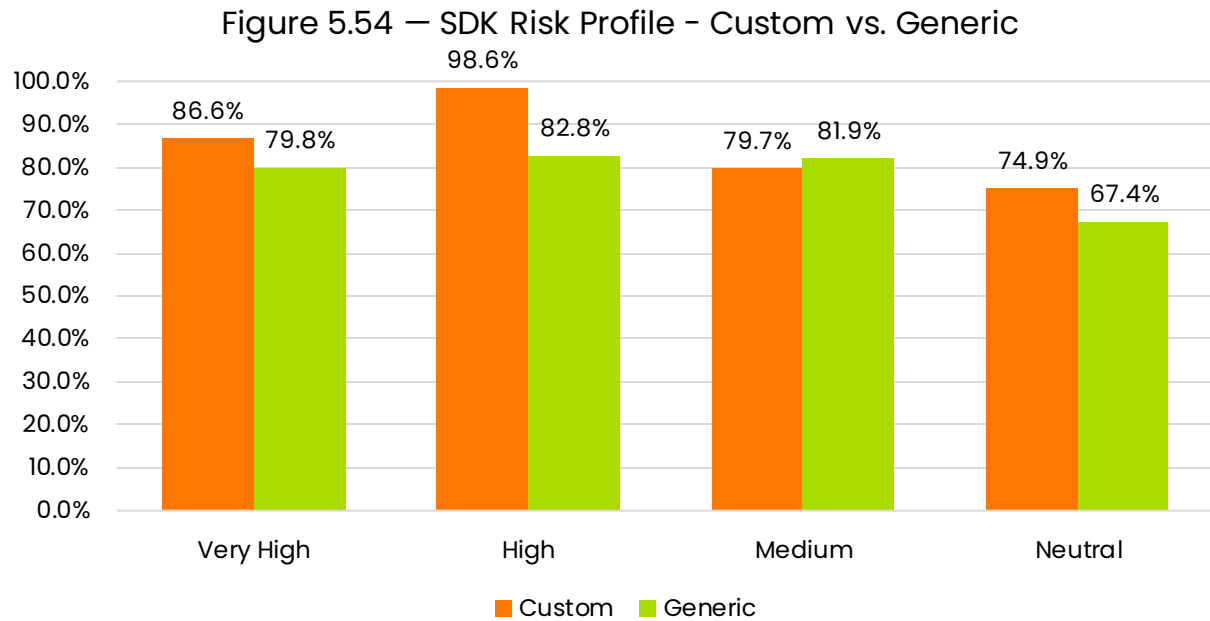
### 5.3.7.2 SDK-based App Risk Profile - All Apps



### 5.3.7.3 SDK-based Risk Profile - All Apps with SDKs



### 5.3.7.4 SDK-based Risk Profile – All Apps with SDKs] by Custom vs. Generic



### 5.3.7.5 SDK-based Risk Profiles by Category

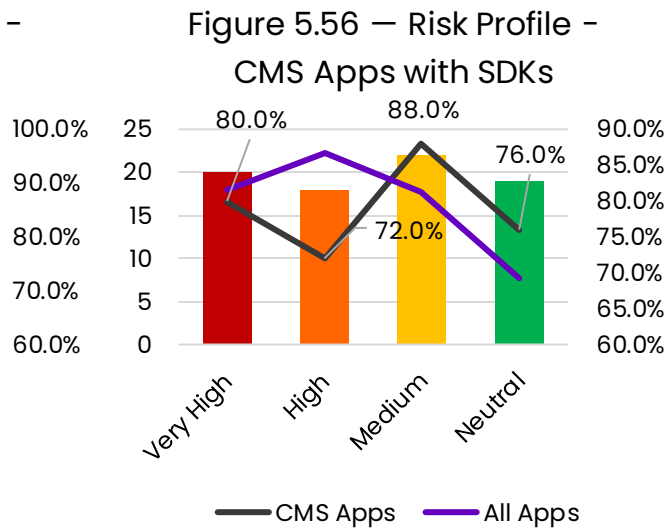
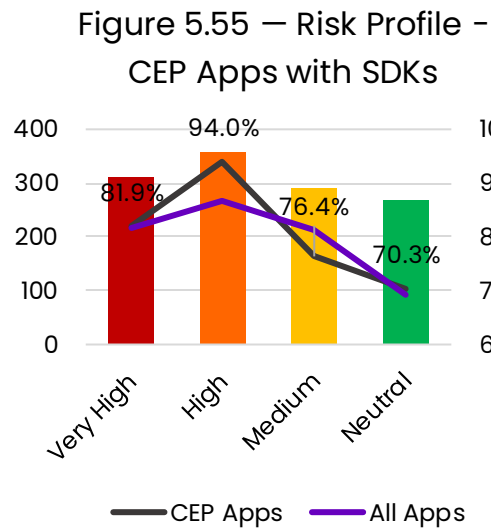


Figure 5.57 — Risk Profile -  
DLP Apps with SDKs

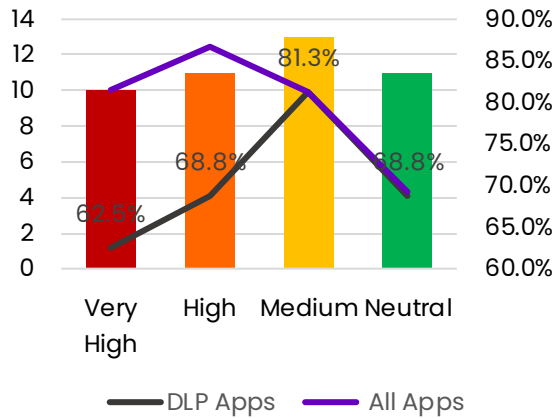


Figure 5.58 — Risk Profile -  
LeMS Apps with SDKs

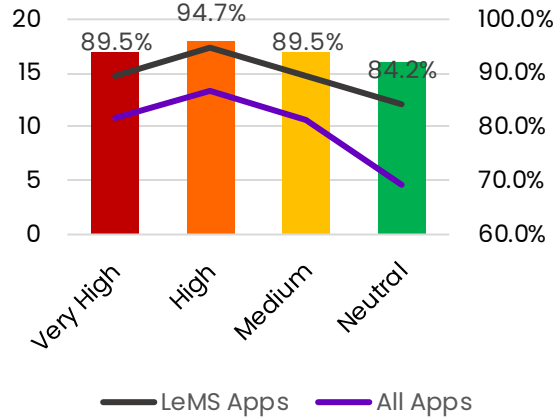


Figure 5.59 — Risk Profile -  
LiMS Apps with SDKs

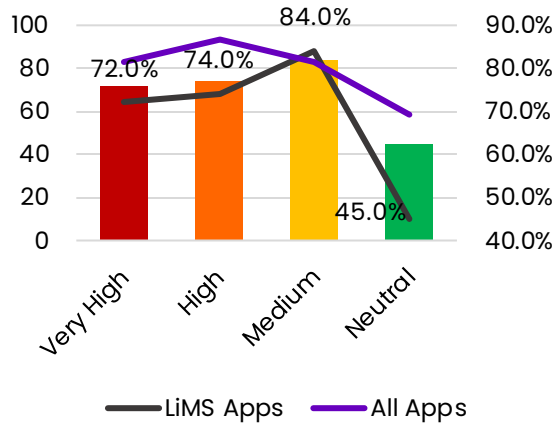


Figure 5.60 — Risk Profile -  
NES Apps with SDKs

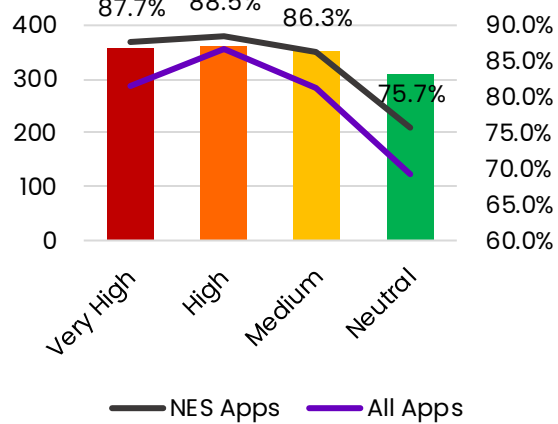


Figure 5.61 — Risk Profile - O Apps with SDKs

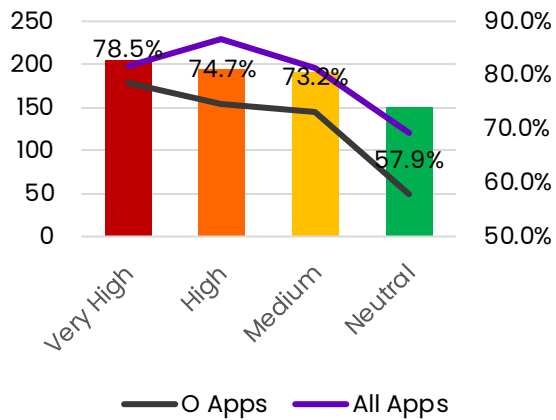


Figure 5.62 — Risk Profile - SIS Apps with SDKs

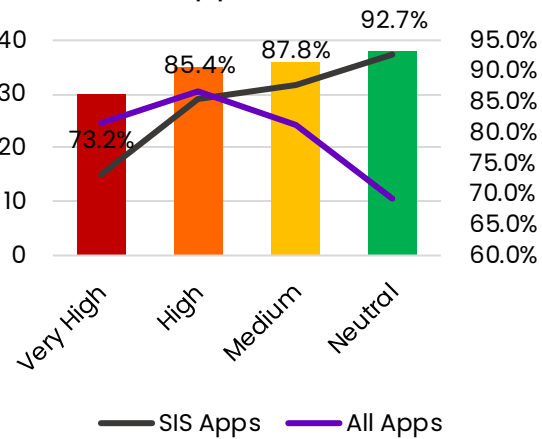


Figure 5.63 — Risk Profile - SMS Apps with SDKs

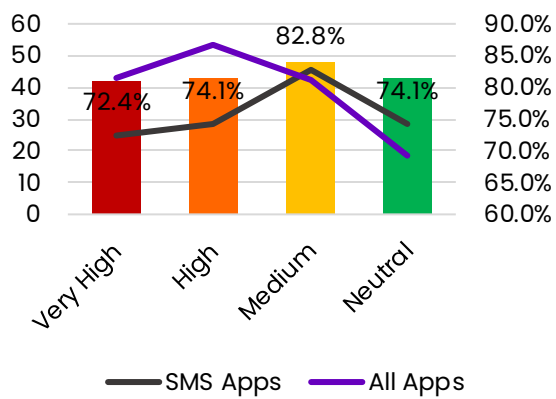


Figure 5.64 — Risk Profile - SP Apps with SDKs

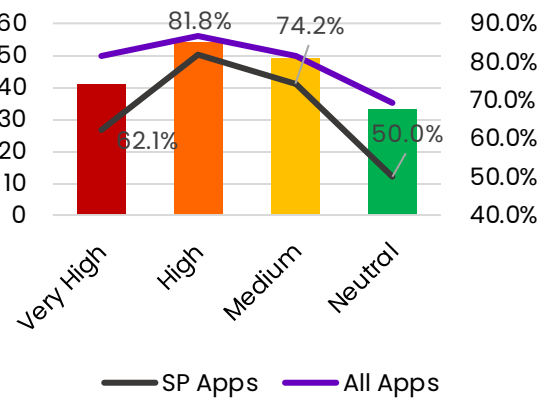


Figure 5.65 — Risk Profile -  
SSO Apps with SDKs

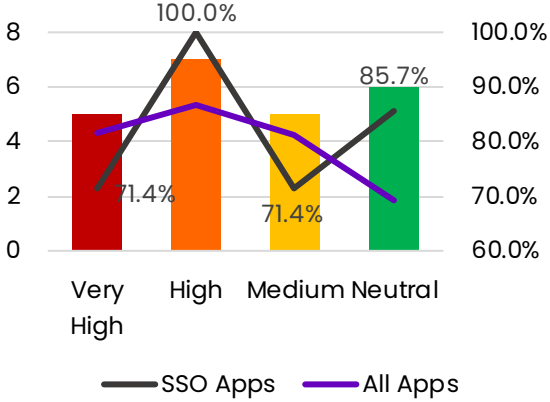


Figure 5.66 — Risk Profile -  
ST Apps with SDKs

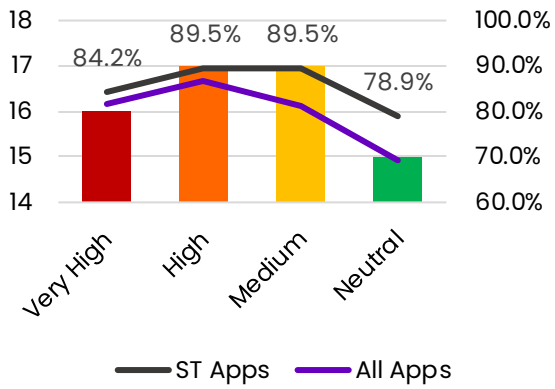


Figure 5.67 — Risk Profile -  
STS Apps with SDKs

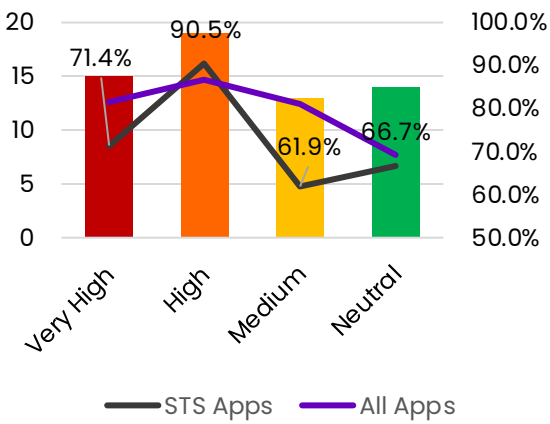
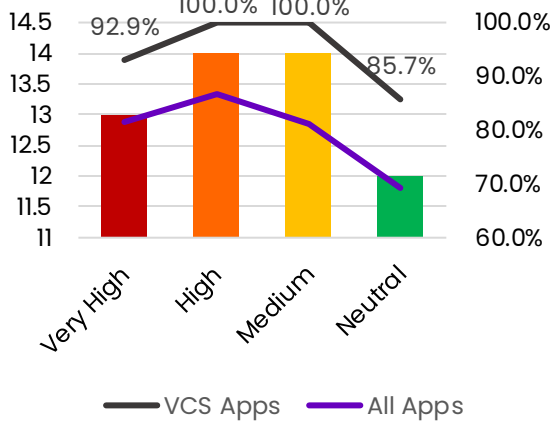
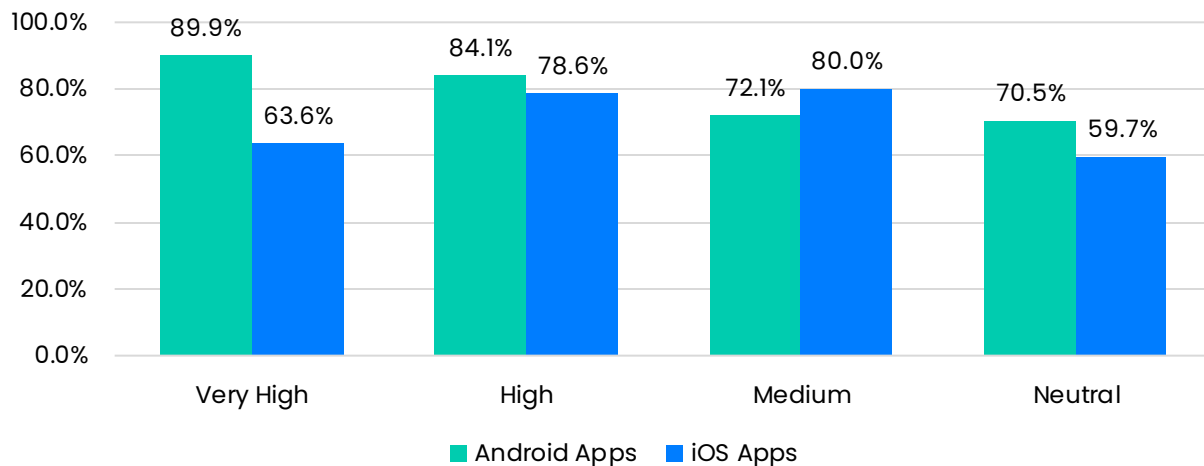


Figure 5.68 — Risk Profile -  
VCS Apps with SDKs



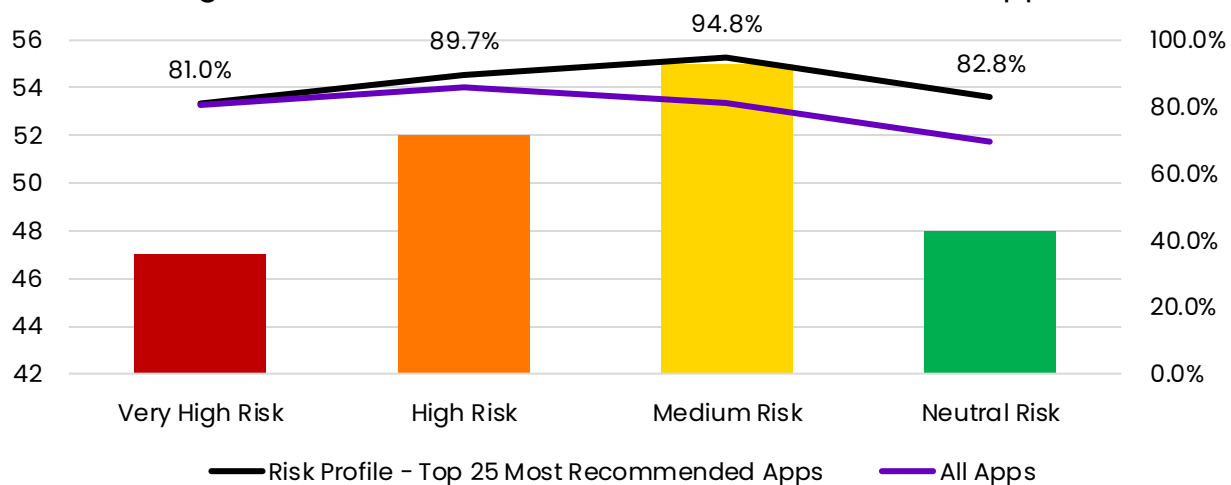
### 5.3.7.6 SDK-based Risk Profile – All Apps with SDKs by iOS vs. Android

Figure 5.69 – SDK Risk Profile – by OS



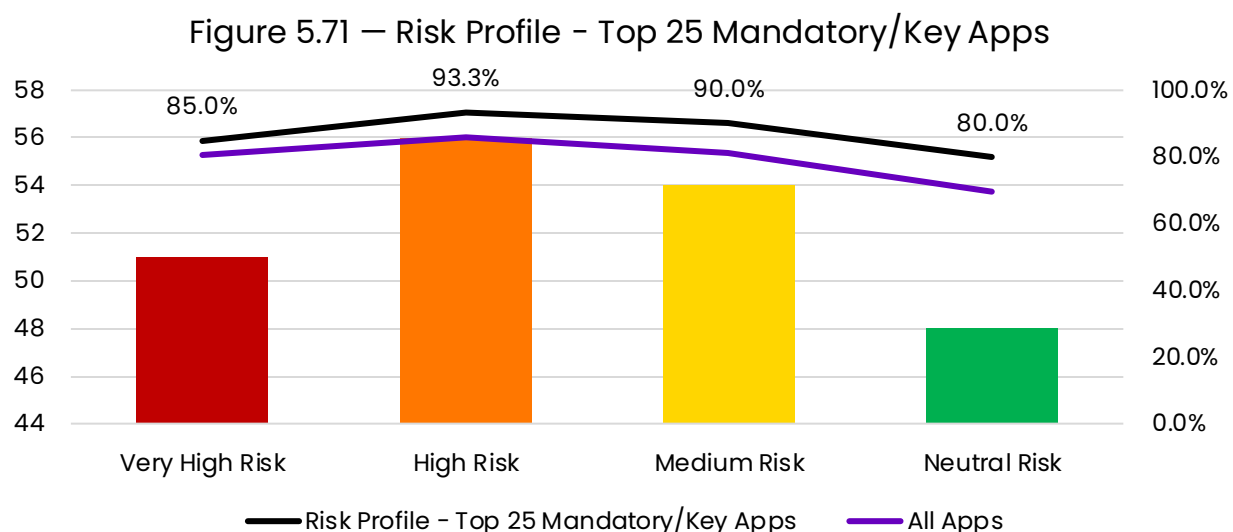
### 5.3.7.7 SDK-based Risk Profile – Most Recommended Apps

Figure 5.70 – Risk Profile – 25 Most Recommended Apps





### 5.3.7.8 SDK-based Risk Profile – Most Frequently Required Apps



## 5.4 Permissions Analysis

To understand the kind of student information apps were accessing, we analyzed mobile app permissions. Mobile operating systems restrict access to features and data and allow apps to request access permissions. We classified the most common permission requests in terms of what risks they posed.

We classified iOS and Android sensitive permissions into seven buckets:

- **Location** includes any permission that potentially allows apps to determine the user's geographic location. Permissions such as wifi network names and bluetooth connections are included in this category because in many cases these names are distinctive and can be compared against databases to guess the location.
- **Files** include any permission that allows apps to list user data files or their contents, whether in the cloud or on device. This access is risky both because files and filenames can include personal information and because it can be used to fingerprint and reidentify a user even if they have reset other identifiers.
- **Join User Identifiers** includes any permission that directly assists advertising networks that wish to track users across apps or across device, such as with Apple's ID for Advertising (IDFA).
- **Physical Environment** includes permissions that reveal information about the user's physical environment, such as through camera and microphone.

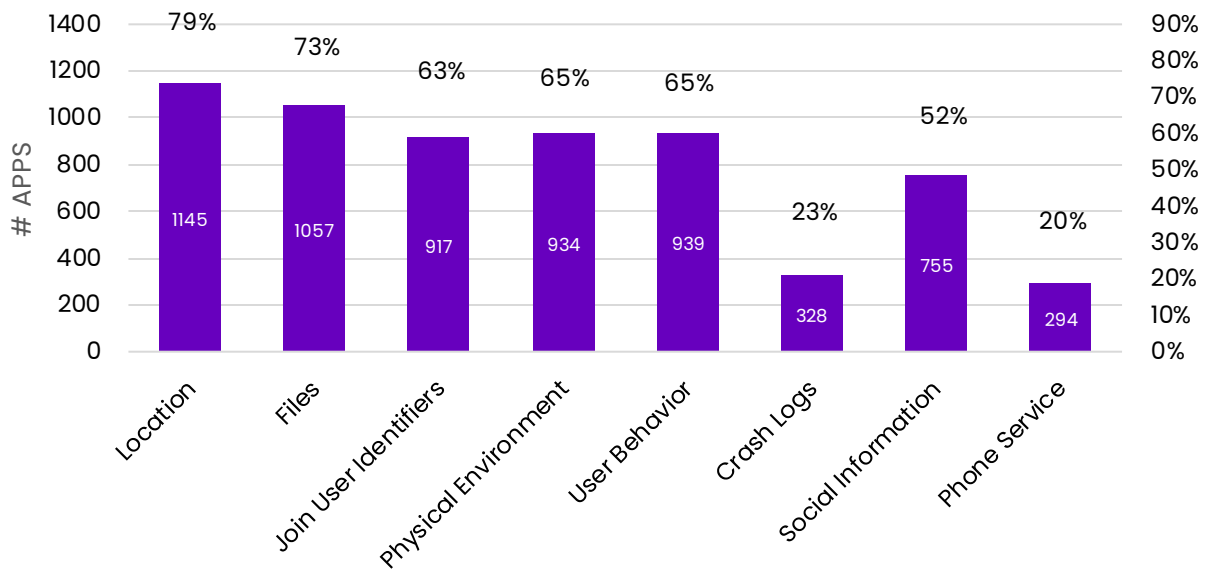
- **User Behavior** permissions include anything that would be useful to advertising networks seeking to learn more about a user, such as their psychology or interests.
- **Crash Logs** include permissions that allow the app publisher to receive information when the app crashes. There is a risk of this information including personal details.
- **Social Information** includes permissions that reveal who the user associates with, as well as when or where they do so. This includes calendar and contacts.
- **Phone Service** includes permissions that reveal who the user's carrier is or whether they currently have service. This can serve as a proxy for location. It may also reveal financial wellbeing.

#### 5.4.1 Permissions Key Findings

- **Location**-related permissions were the most frequently occurring permission, appearing in **79%** of all apps.
- **73%** of apps requested **Files** access.
- **65%** of apps requested **Physical Environment** permissions such as camera and microphone access.
- **65%** of apps requested **User Behavior** permissions.
- **52%** of apps requested access to **Social Information**.
- Custom vs. Generic apps:
  - More **Custom** apps accessed key permissions than the overall apps.
    - **81%** of **Custom** apps accessed **Location Information**.
    - **69%** of **Custom** apps accessed **Social Information**.
  - Generic apps generally accessed key permissions in line with the overall app dataset.
- iOS vs. Android apps:
  - **100%** of **Android** apps requested **Location** permissions.
  - **Android** apps requested permissions **more** frequently than **iOS** apps except for:
    - **Physical Location: 73%** of **iOS** apps compared to **56%** of **Android** apps.
    - **Crash Logs: 46%** of **iOS** apps compared to **0%** of **Android** apps.
    - **Social Information: 61%** of **iOS** apps compared to **43%** of **Android** apps.

## 5.4.2 Permissions – All Apps

Figure 5.72 – Permissions – All Apps



## 5.4.3 Permissions – Custom vs Generic Apps

Figure 5.73 – Permissions – Custom Apps

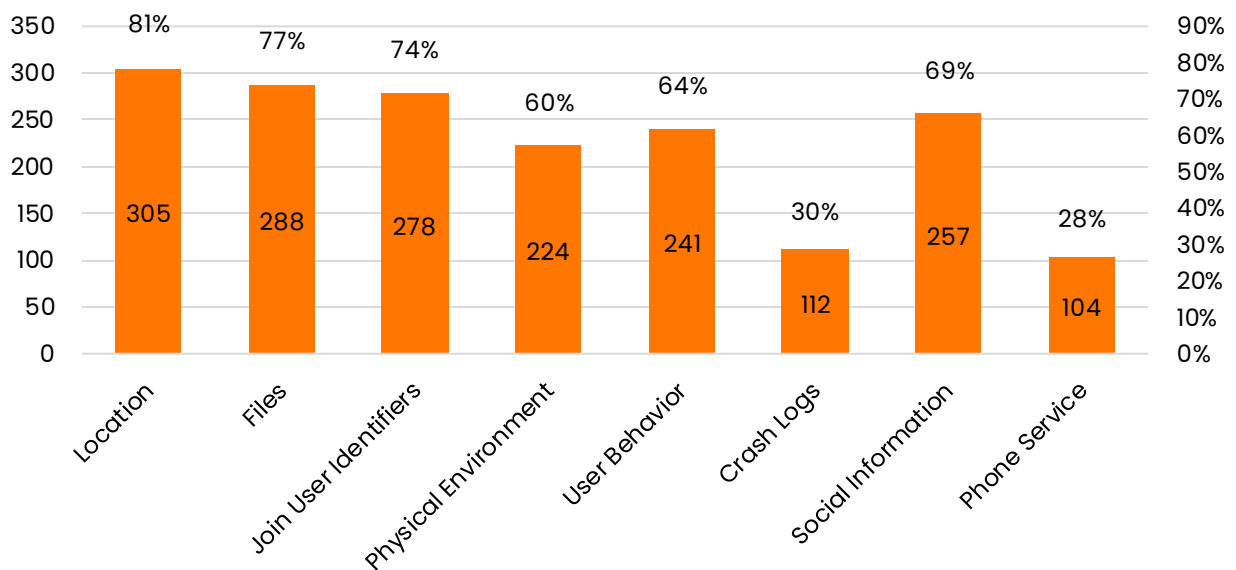
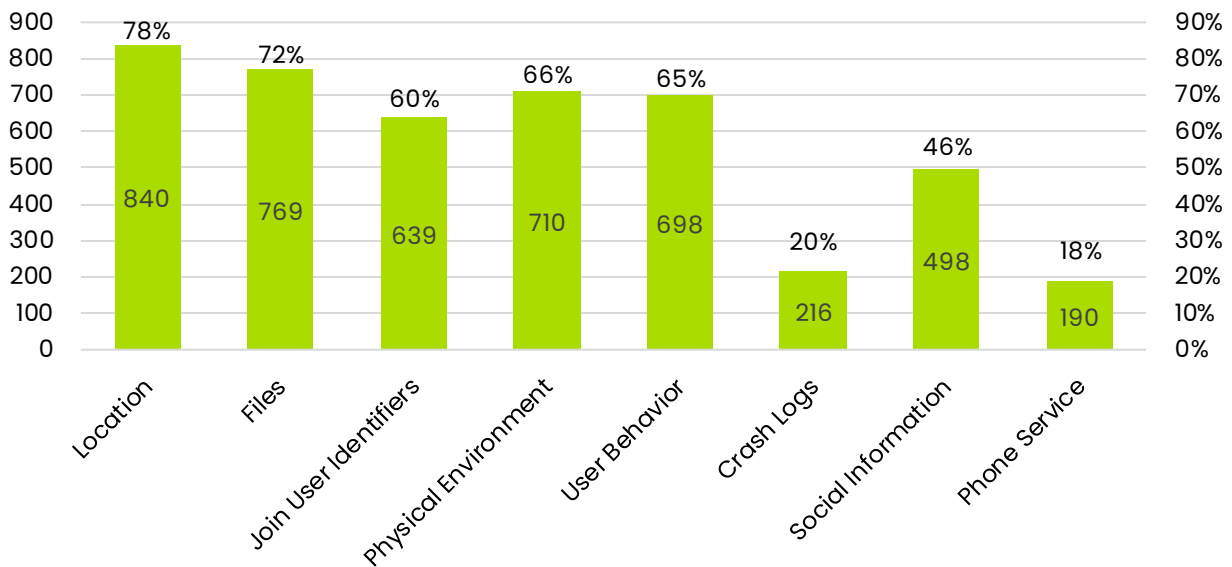


Figure 5.74 — Permissions - Generic Apps

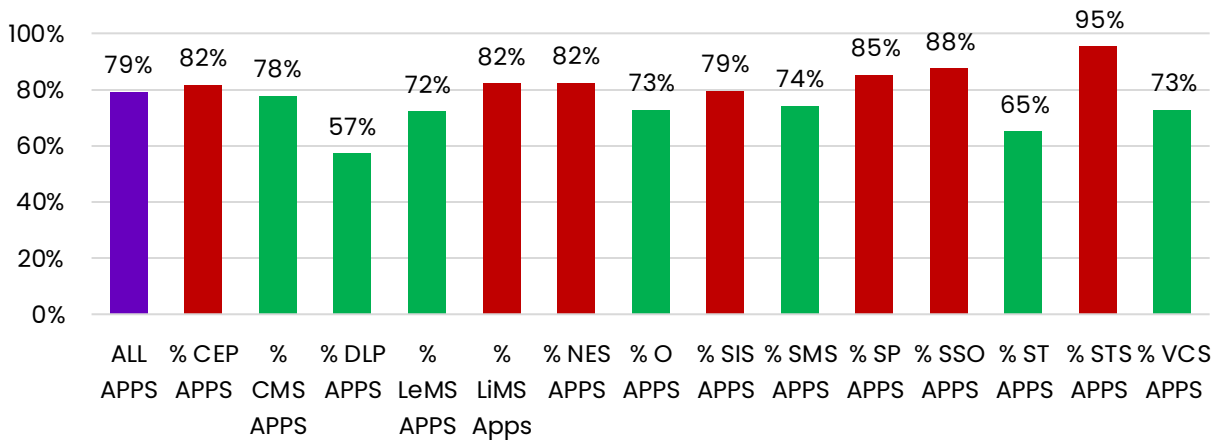


#### 5.4.4 Permissions by Category

The charts in this section convey how each category of apps compares to the permission behavior of the overall dataset. The intention is to try to characterize which categories have proclivities towards certain types of data.

Appendix D contains the permission summaries per category.

Figure 5.75 — % of Apps with Location Permissions by Category



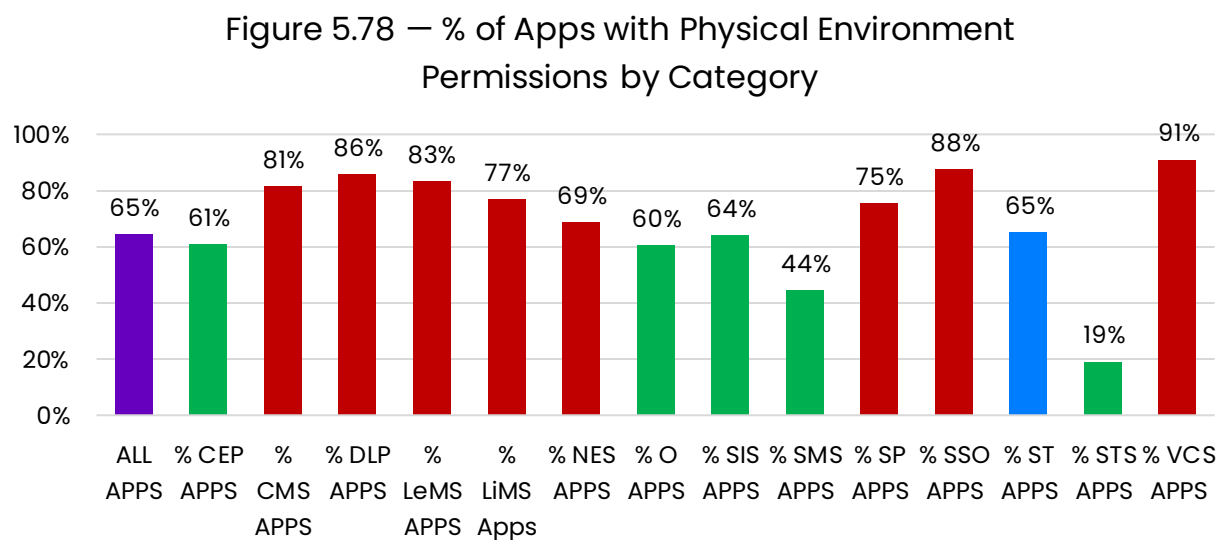
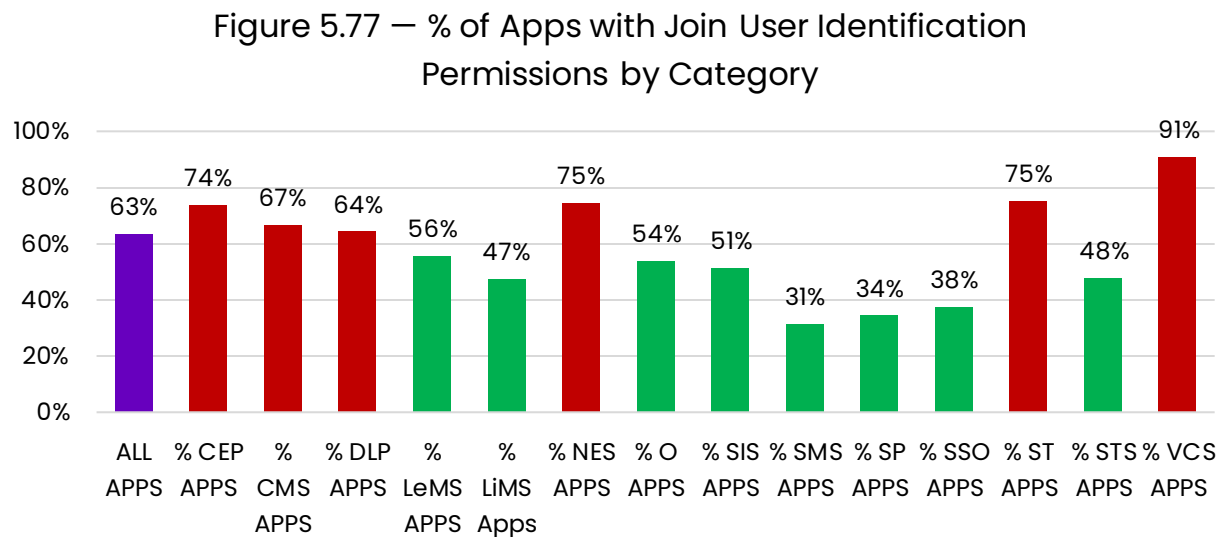
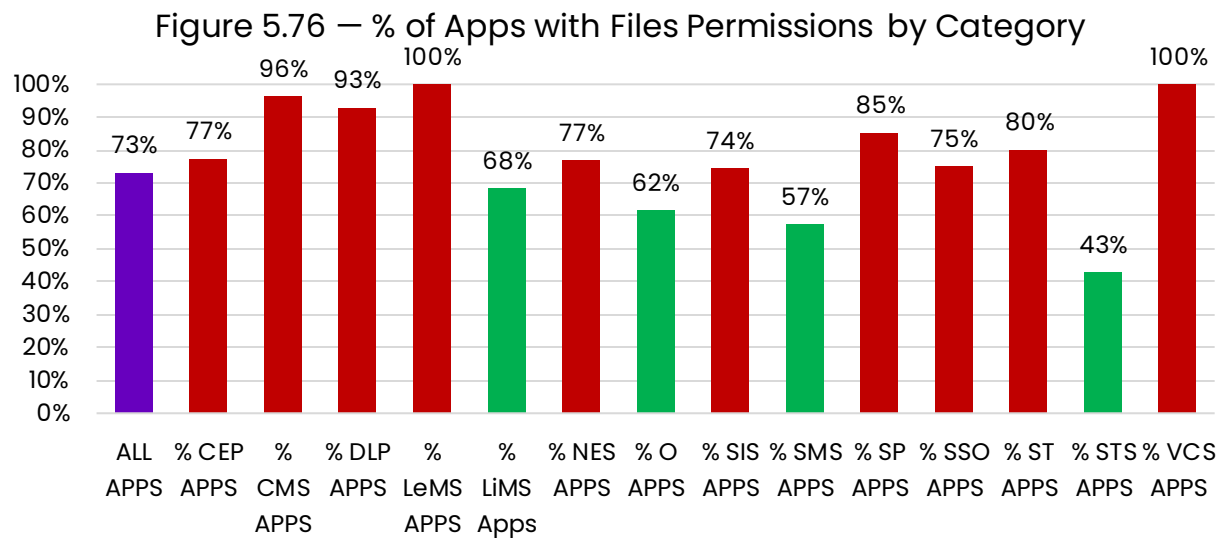


Figure 5.79 — % of Apps with User Behavior Permissions by Category

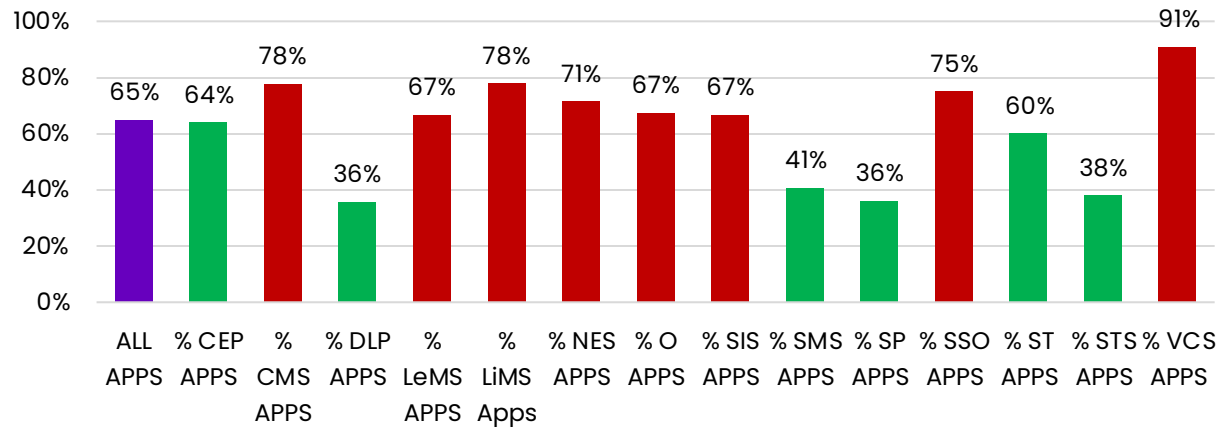


Figure 5.80 — % of Apps with Social Information Permissions by Category

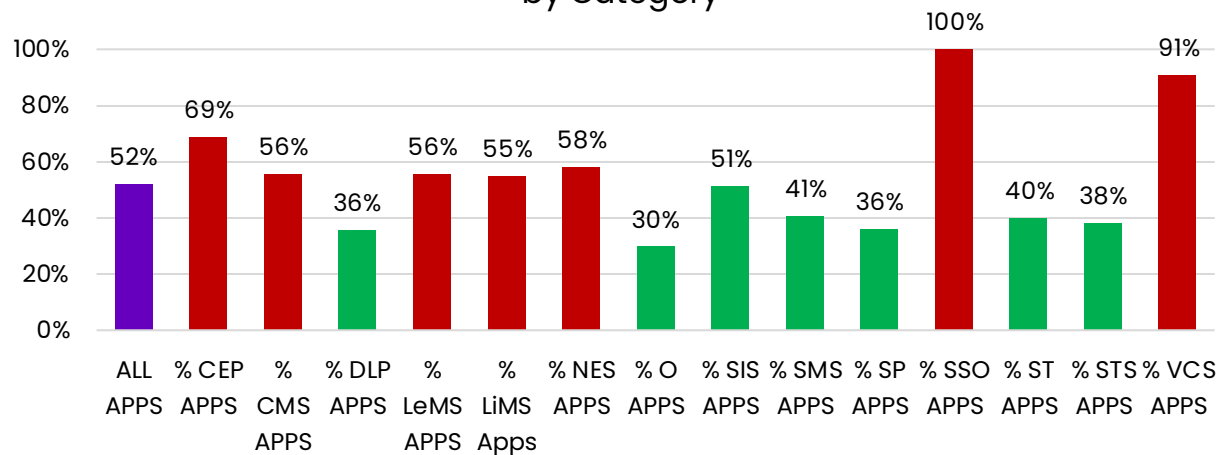
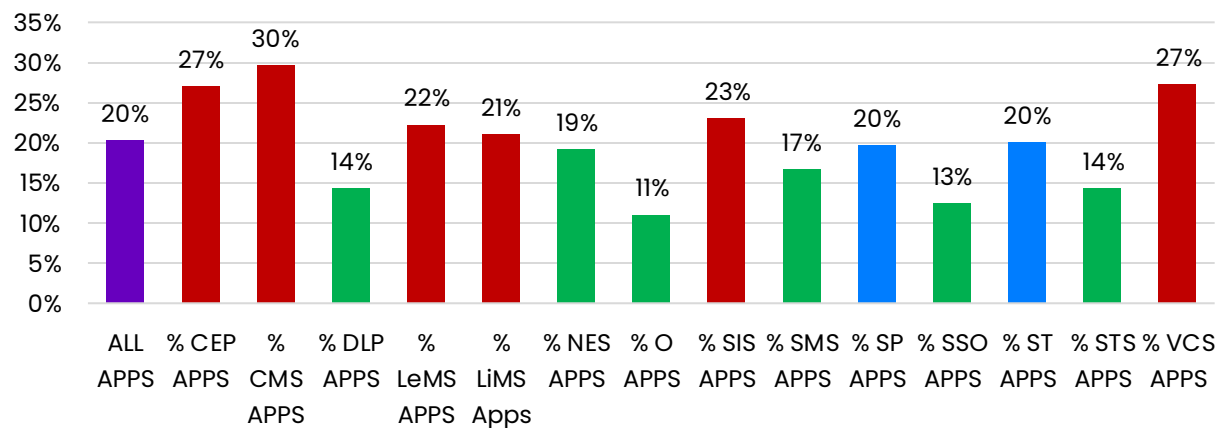


Figure 5.81 — % of Apps with Phone Service Permissions by Category



## 5.4.5 Permissions – iOS vs Android

Figure 5.82 – Permissions – iOS Apps

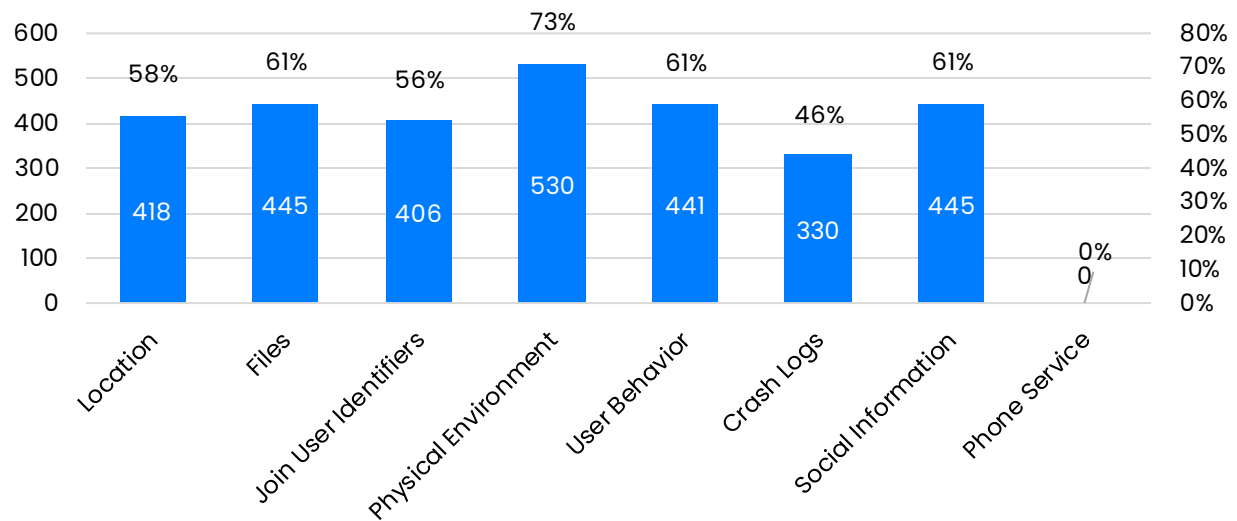
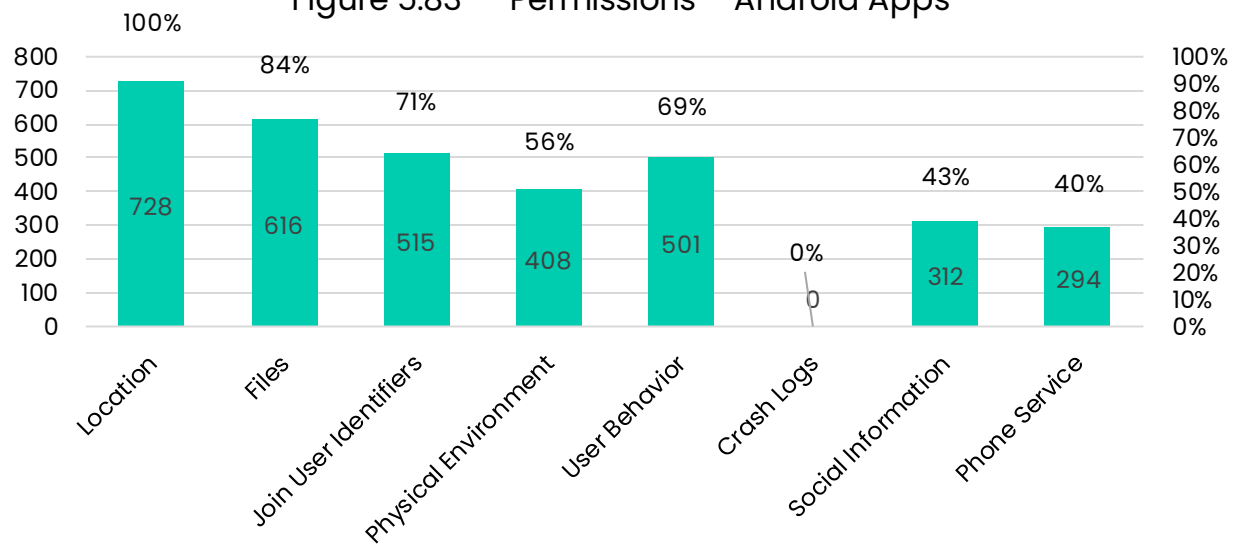
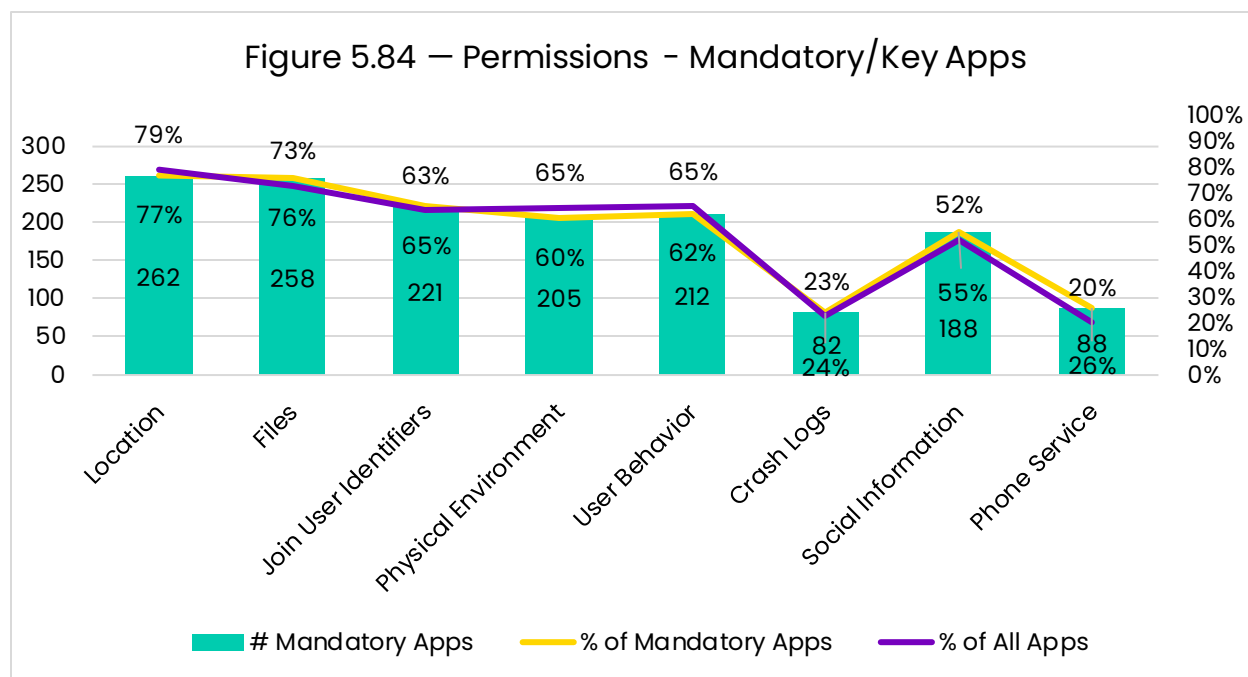


Figure 5.83 – Permissions – Android Apps



## 5.4.6 Permissions – Most Required Apps



## 5.5 Advertising Analysis

This section describes the advertising behaviors observed in the testing of the apps. We looked for two things:

1. Any type of advertising—indicating that adtech was being utilized to populate advertising area within the app, and
2. Retargeting advertising in particular, namely ads that were personalized based on browser history or other personal information.

Both behaviors are dangerous to children and should not exist in apps being used by children, as they both result in personally identifying information being sent into the vast adtech network. Retargeting advertising is significantly worse, as it implies that more of the child's information is being sent to the adtech network, which is why it's been banned for students in 25 states.<sup>4</sup>

We also observed "sponsorship" ads that appeared to be hard-coded local sponsorships (similar to what is found in school yearbooks). We tracked instances of those separately, as they do not represent the safety risk that traditional digital ads do.

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<sup>4</sup> "The State Student Privacy Report Card", p. 8, Parent Coalition for Student Privacy, January 2019. <https://t8bb96.a2cdn1.secureserver.net/wp-content/uploads/2019/01/The-2019-State-Student-Privacy-Report-Card.pdf>



It should be noted that it's very likely that the ad presence and retargeting ad presence numbers are lower than the actual ad presence, since these were tagged only when observed by our researchers in the course of manually testing the app.

### 5.5.1 Advertising Key Findings

- **23%** of all tested apps **included advertising**. This is a much larger than desired amount of advertising.
- **13%** of all tested apps included **retargeting personalized advertising**.
- Custom and Generic apps behaved largely the same, **except there were more retargeting ads in generic apps**.
- If we remove the non-education specific (NES) apps, the percent of tested apps with ads drops to 18% and the percent of apps with retargeting ads drops to 9%. Still too high to be safe for students.
- iOS vs. Android:
  - There was no appreciable difference between the platforms with respect to ad presence. This speaks to the fact that both platforms can yield safe apps.

Figure 5.85 — Ad Presence - All Apps

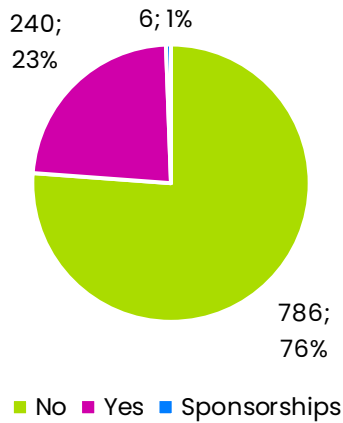


Figure 5.86 — Ad Presence - Custom Apps

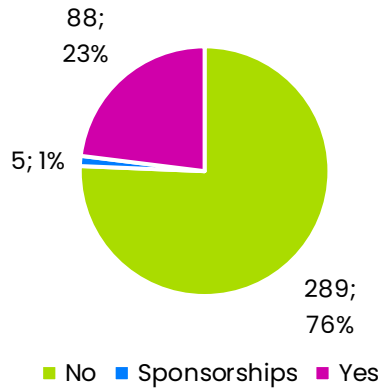


Figure 5.87 — Ad Presence - Generic Apps

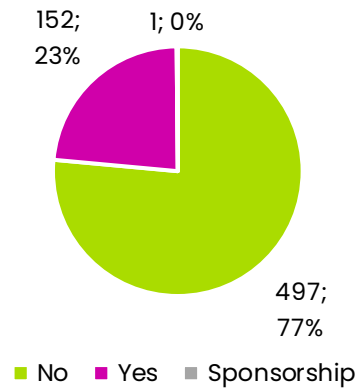


Figure 5.88 — Retargeting Ad Presence - All Apps

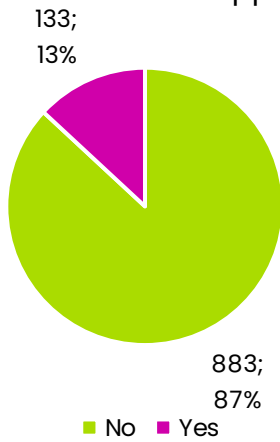


Figure 5.89 — Retargeting Ad Presence - Custom Apps

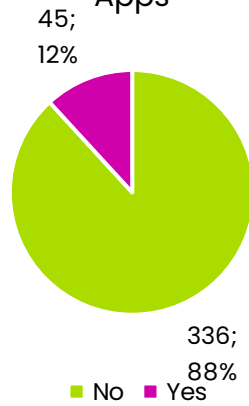
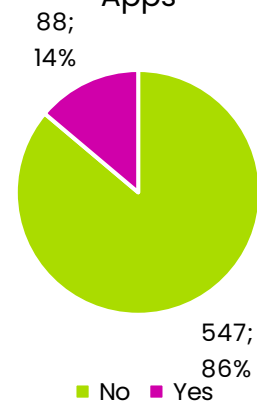


Figure 5.90 — Retargeting Ad Presence - Generic Apps



## 5.5.2 Ad Presence Excluding Non-Education Specific (NES) Apps

Non-education specific apps contained the most retargeted ads, and we wanted to see the behavior across everything but the NES apps.

Figure 5.91 — Ad Presence  
Total - Excluding NES

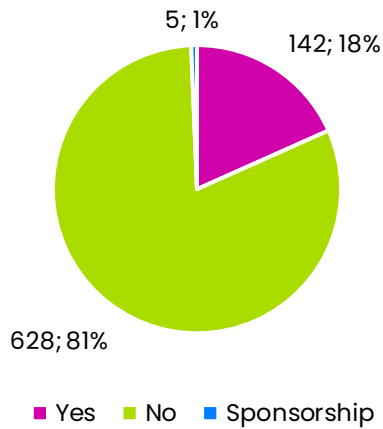
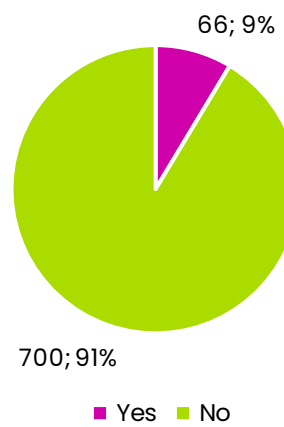
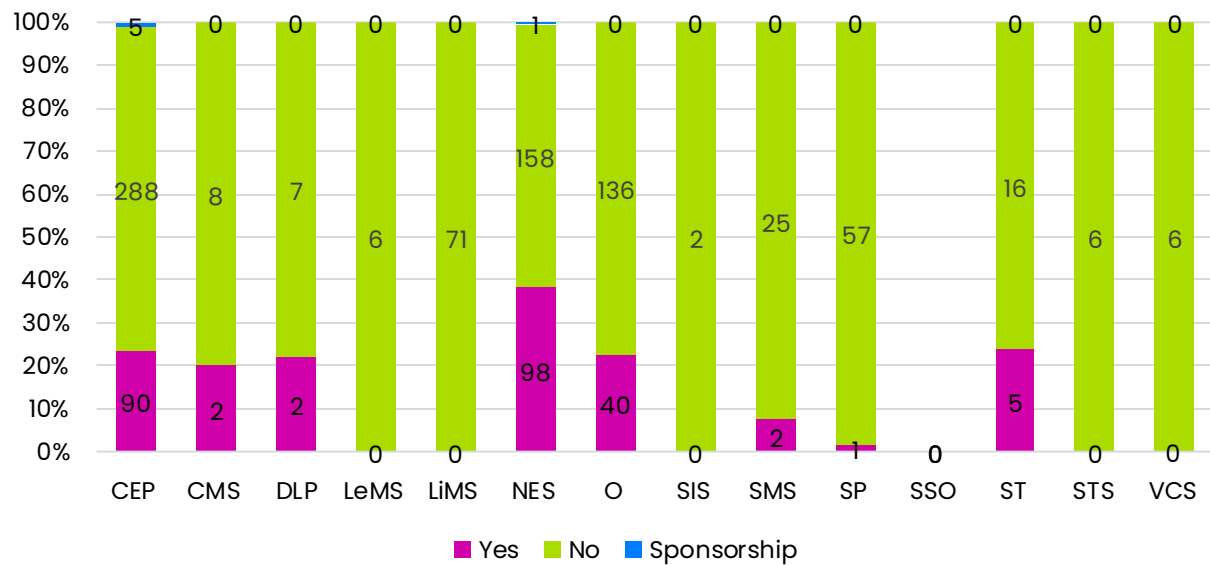


Figure 5.92 — Retargeting Ad  
Presence - Excluding NES



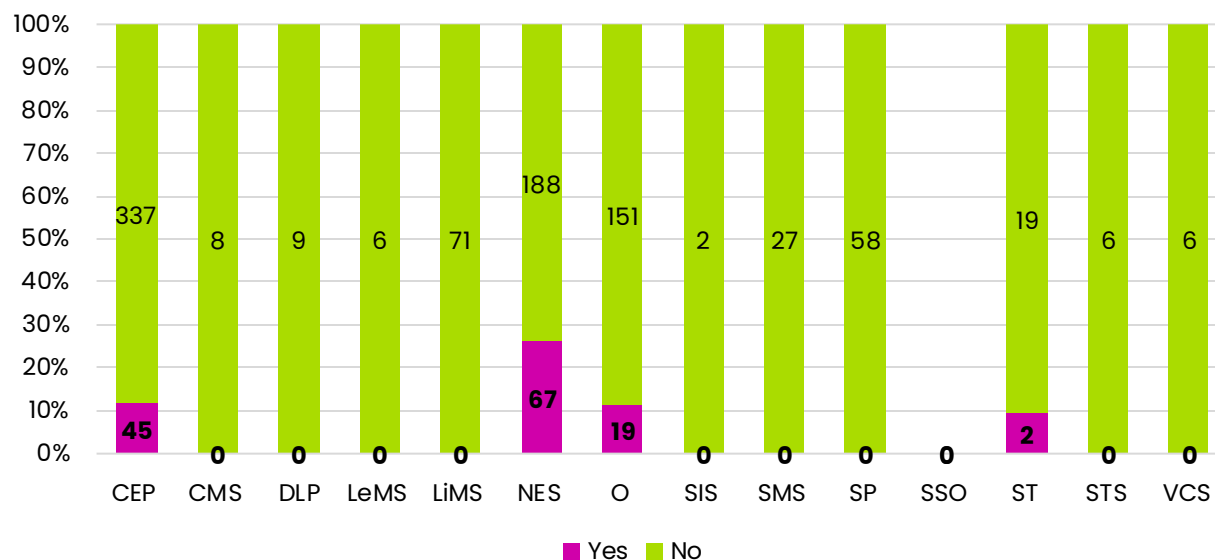
### 5.5.3 Ad Presence by App Category

Figure 5.93 — Ad Presence by App Category



## 5.5.1 Retargeting Ad Presence by App Category

Figure 5.94 — Retargeting Ad Presence by App Category



## 5.5.2 Ad Presence by OS

Figure 5.95 — Ad Presence in Android Apps

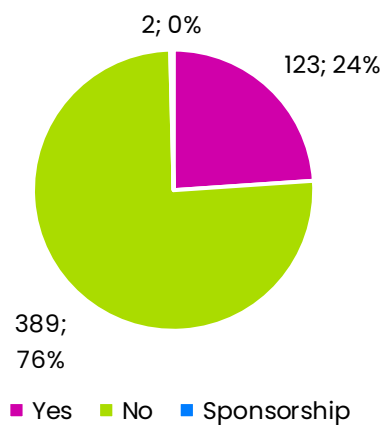
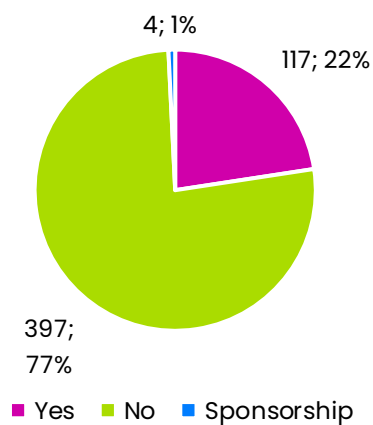


Figure 5.96 — Ad Presence in iOS Apps



### 5.5.3 Retargeting Ad Presence by OS

Figure 5.97 — Retargeting Ad Presence in Android Apps

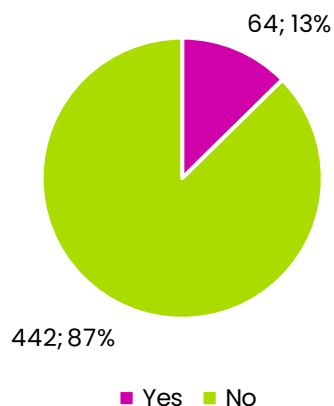
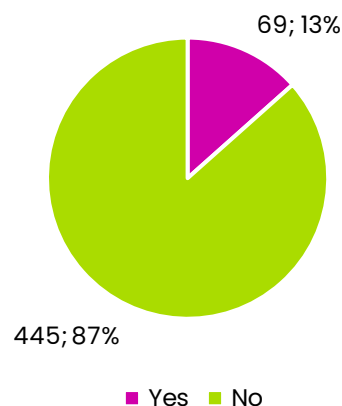


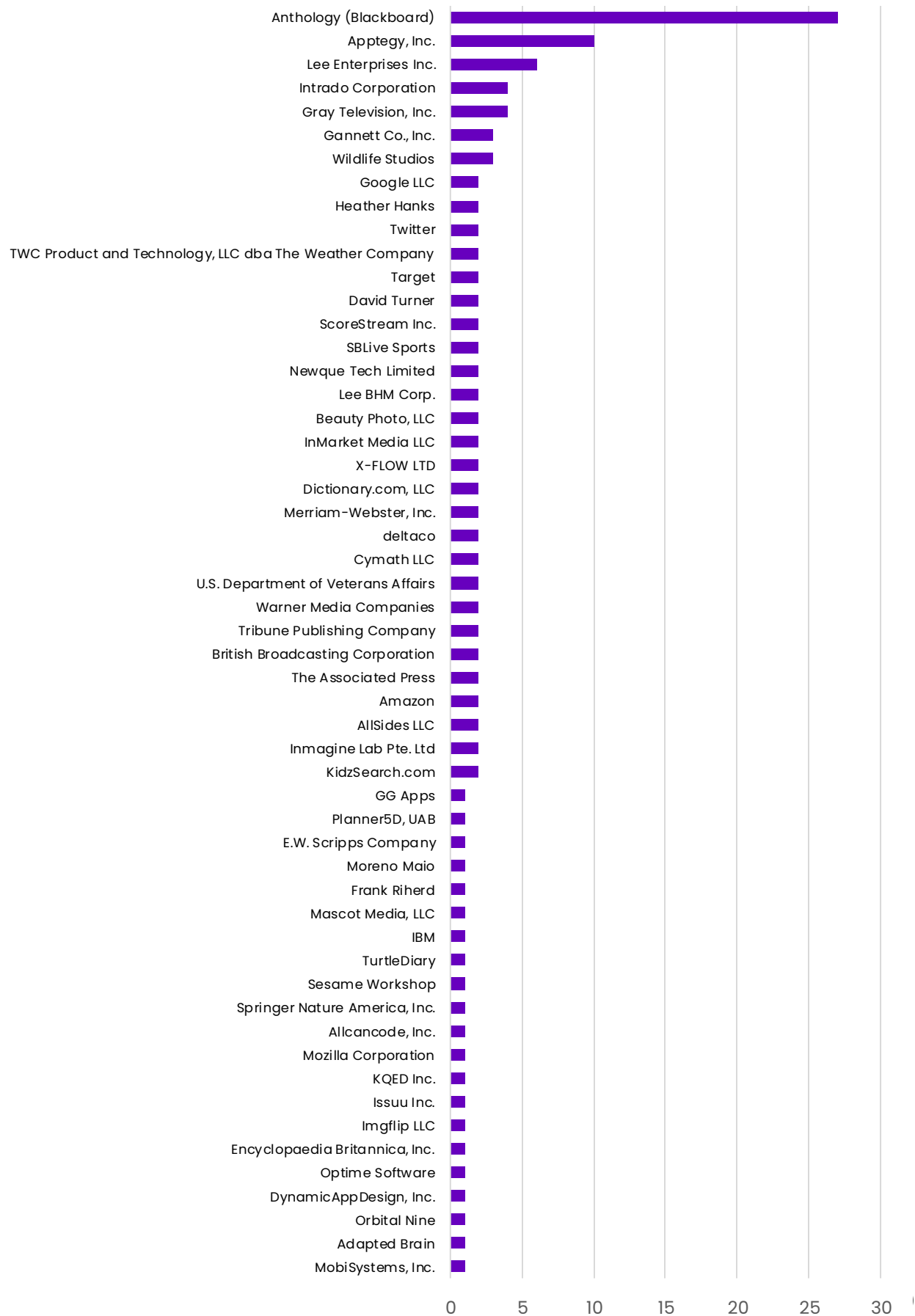
Figure 5.98 — Retargeting Ad Presence in iOS Apps



### 5.5.4 Developers with Observed Retargeting Ads

Figure 5.98a below shows the developers with observed retargeting ads in the apps. Many of these apps are not strictly for children, so the presence of retargeting ads isn't overly surprising. However, there are noteworthy K12 edtech developers including Blackboard and Apptegy. We also compiled the full list of apps that had retargeting ads in Appendix E. Note that the list of apps includes several CES type apps, a "COVID Coach" app, a math skills app, and several coloring book apps, which are among the least safe apps.

Figure 5.98a — Developers of Apps with Observed Retargeting Ads



## 5.6 Data Sharing with Large Platforms Analysis

As mentioned earlier, in this report we recorded network traffic on all testable apps. For this report, we are including findings on observed data sent to six of the largest platforms, specifically:

- Adobe
- Amazon
- Apple
- Facebook
- Google
- Twitter

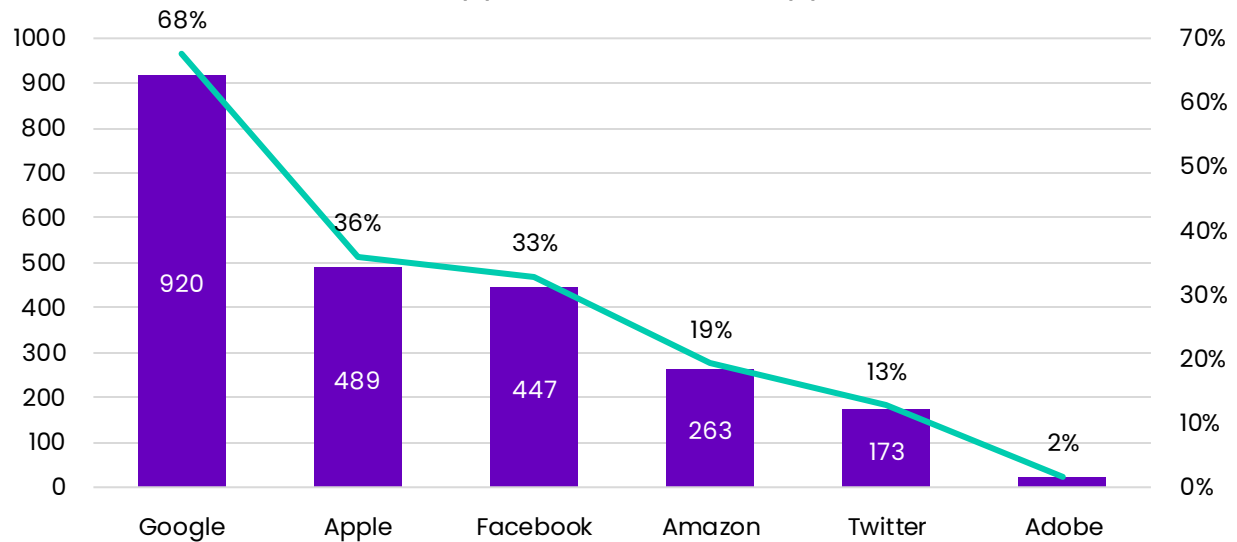
### 5.6.1 Platform Data Sharing Key Findings

- **68% of tested apps sent data to Google**
- 36% of tested apps sent data to Apple
- 33% of tested apps sent data to Facebook
- **34% of tested apps sent data to 3 or more of the 6 platforms.**
- **11% of tested apps sent data to 5 of 6 platforms.**
- Custom vs. Generic Apps:
  - Generic apps had more traffic to:
    - Google (71%) than Custom apps (61%)
    - Apple (40%) than Custom apps (26%).
    - Adobe (2%) than Custom apps (1%)
  - Custom apps had more traffic to:
    - Facebook (41%) than Generic apps (30%)
    - Amazon (27%) than Generic apps (16%)
    - Twitter (25%) than Generic apps (8%)
  - **61% of Custom apps were observed sending data to Google, significantly higher than the 49% of apps as reported in Spotlight Report #1.**
- By Category:
  - 45% of Study Tool (ST) apps and 40% of Community Engagement Platforms (CEP) apps sent data to Facebook.
  - The Study Tool (ST) category of apps sent more data to Amazon, Apple, Facebook, Google and Twitter than any other category (as a % of apps).
- iOS vs. Android:
  - **iOS apps more frequently sent data to all six large platforms than Android apps.**
- Most recommended and most frequently required apps:
  - **None** of the tested most recommended or most frequently required apps had traffic to **Amazon** or **Twitter**.

- **Only 2%** of tested most **required** and **3%** of most **recommended** apps sent traffic to **Facebook**.
- Google:
  - **80%** of tested most frequently **required** apps sent data to **Google**.
  - **68%** of tested most **recommended** apps sent data to **Google**.
- Apple:
  - **35%** of tested most frequently **required** apps sent data to **Apple**.
  - **30%** of tested most **recommended** apps sent data to **Apple**

## 5.6.2 Platform Data Sharing - All Apps

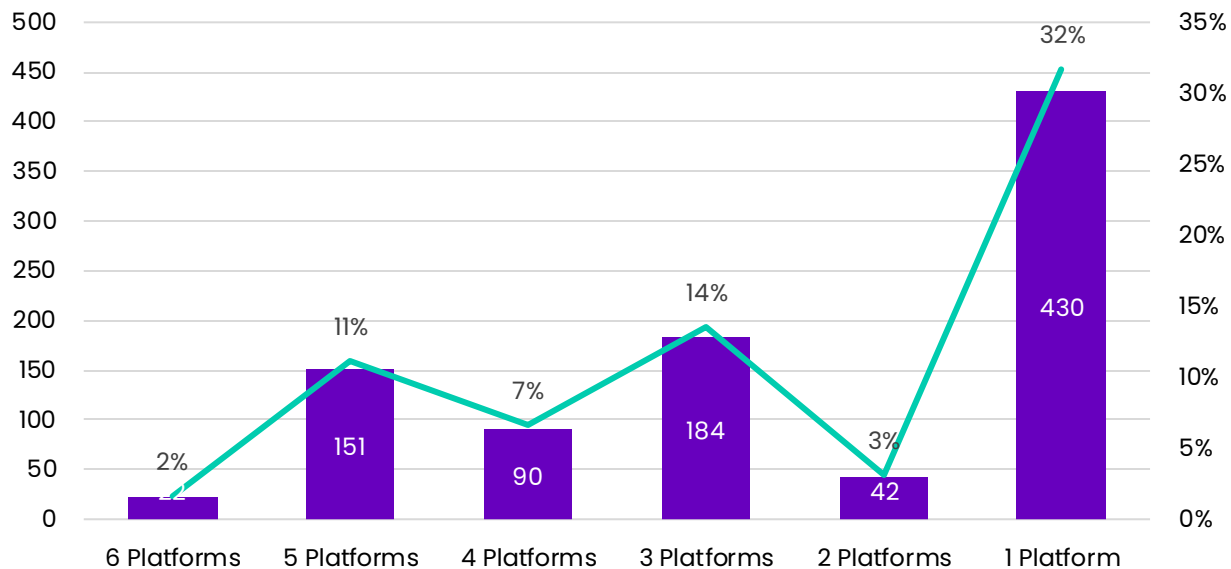
Figure 5.99 — Observed Network Traffic to Platforms -  
All Apps, as % of tested apps





### 5.6.3 Platform Data Sharing Frequency

Figure 5.100 — # Platforms Observed



### 5.6.4 Platform Data Sharing - Custom vs. Generic Apps

Figure 5.101 — Observed Network Traffic to Platforms - Custom Apps, as % of apps

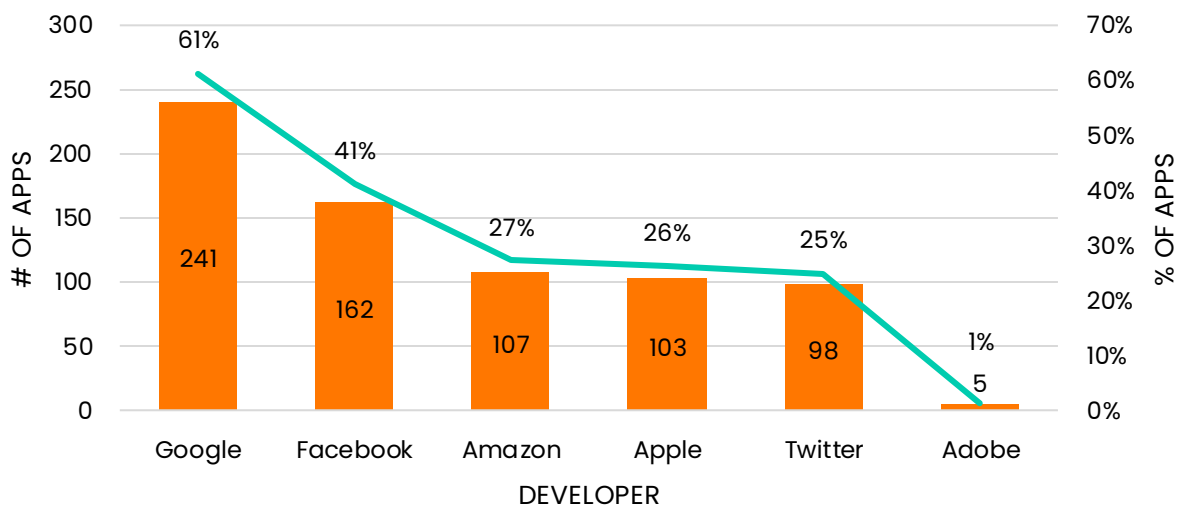
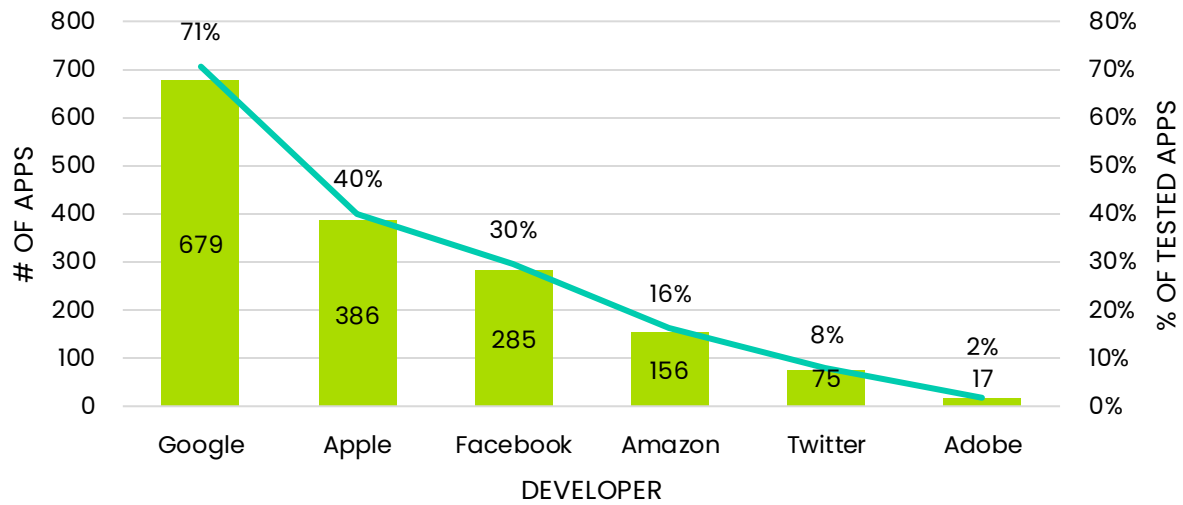


Figure 5.102 — Observed Network Traffic to Platforms –  
Generic Apps, as % of tested apps



### 5.6.5 Platform Data Sharing – by App Category

Figure 5.103 — # Apps with NW Traffic to Adobe by Category

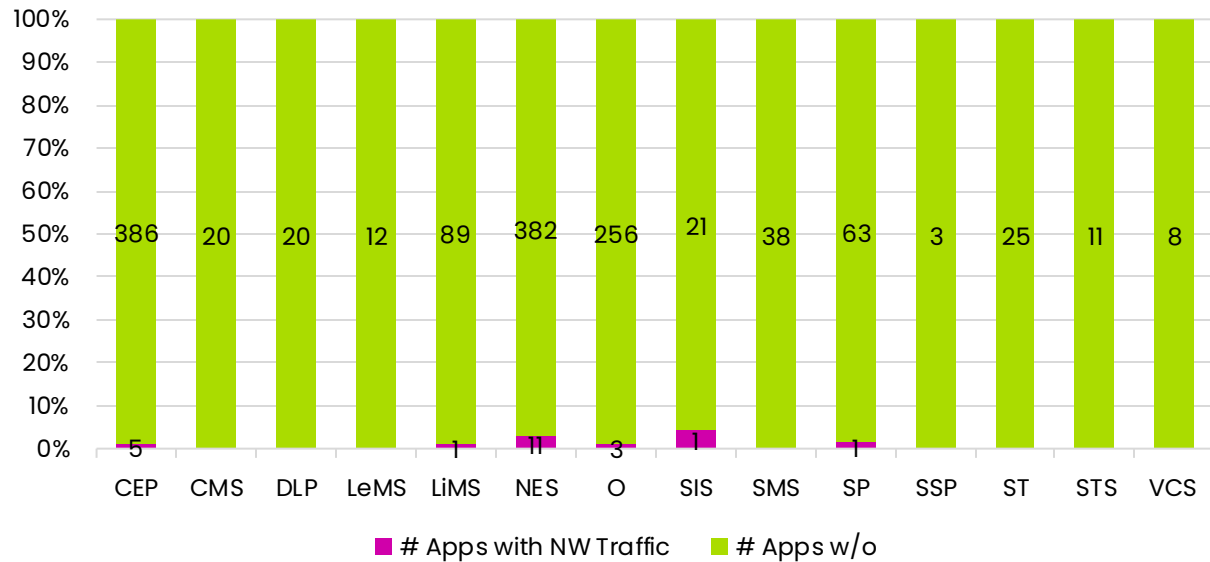


Figure 5.104 — # Apps with NW Traffic to Amazon by Category

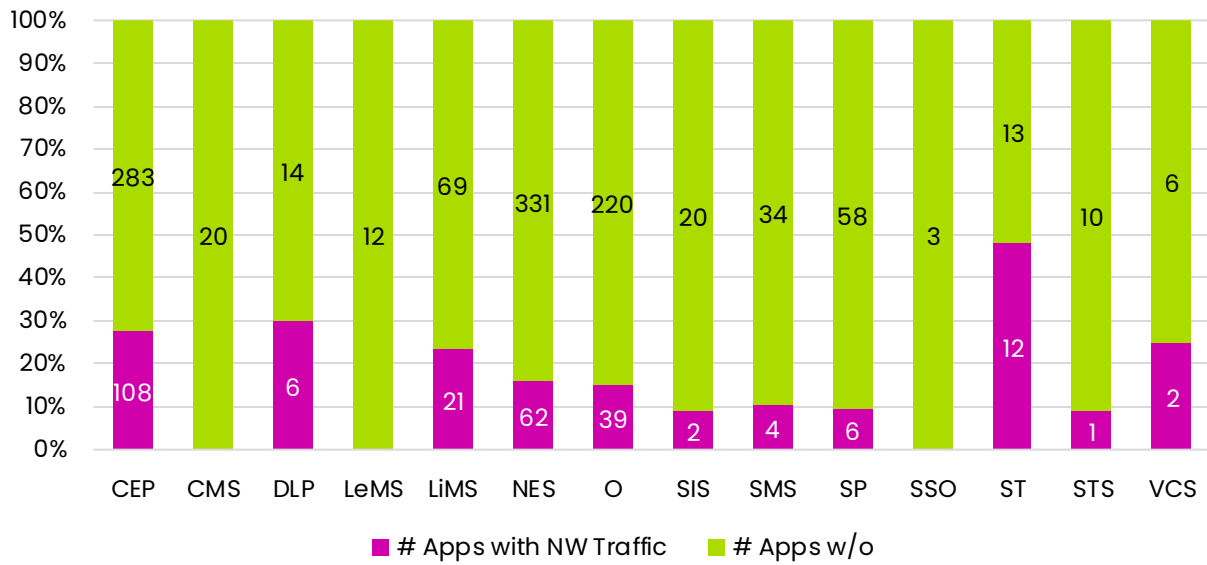


Figure 5.105 — # Apps with NW Traffic to Apple by Category

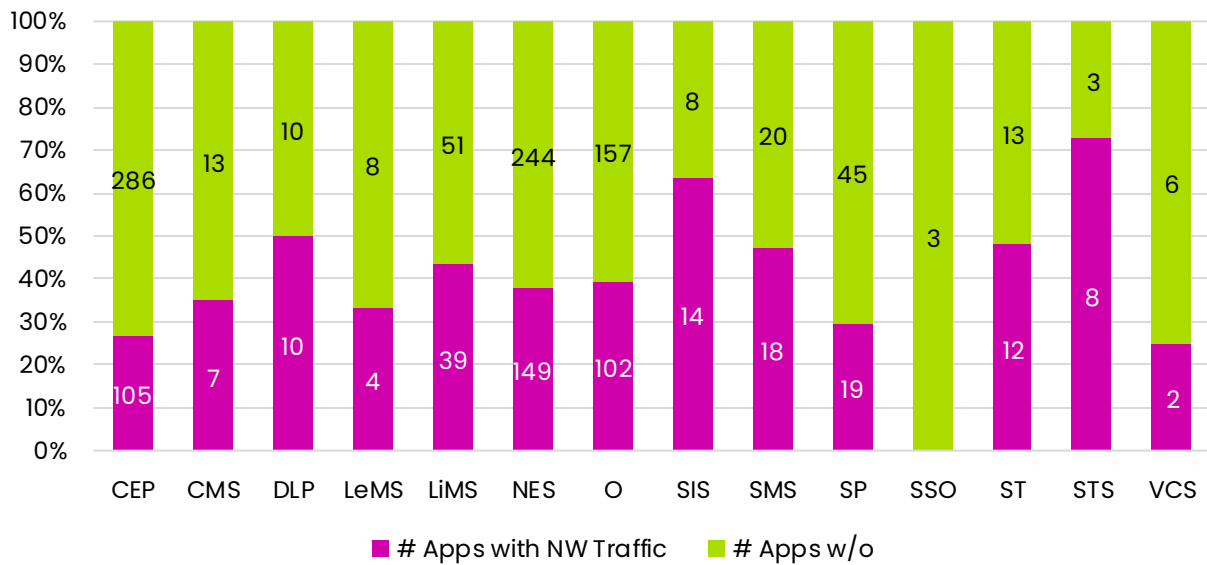


Figure 5.106 — # Apps with NW Traffic to Facebook by Category

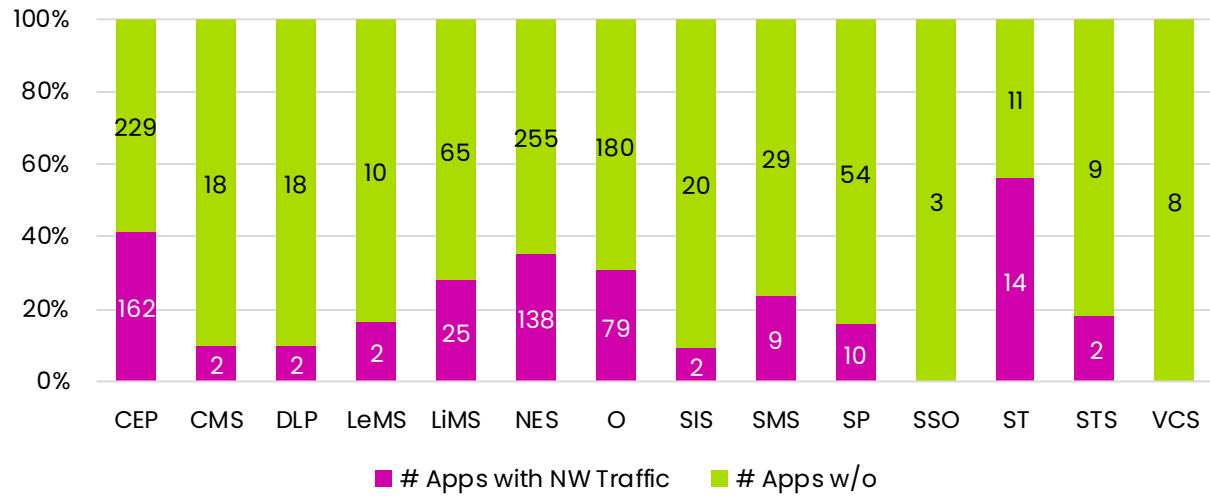


Figure 5.107 — # Apps with NW Traffic to Google by Category

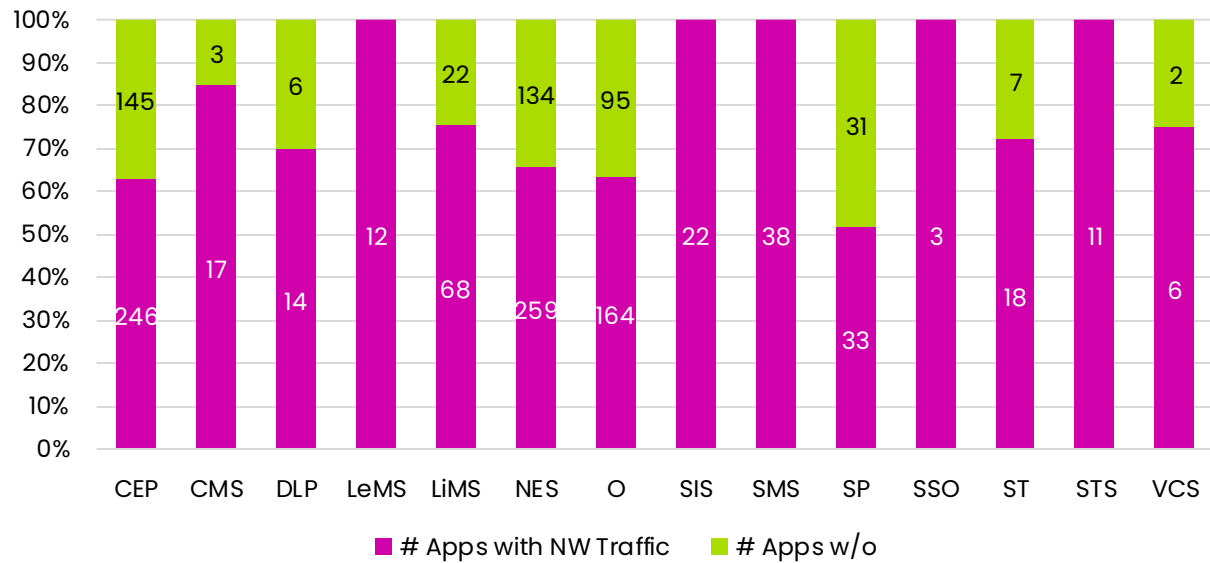
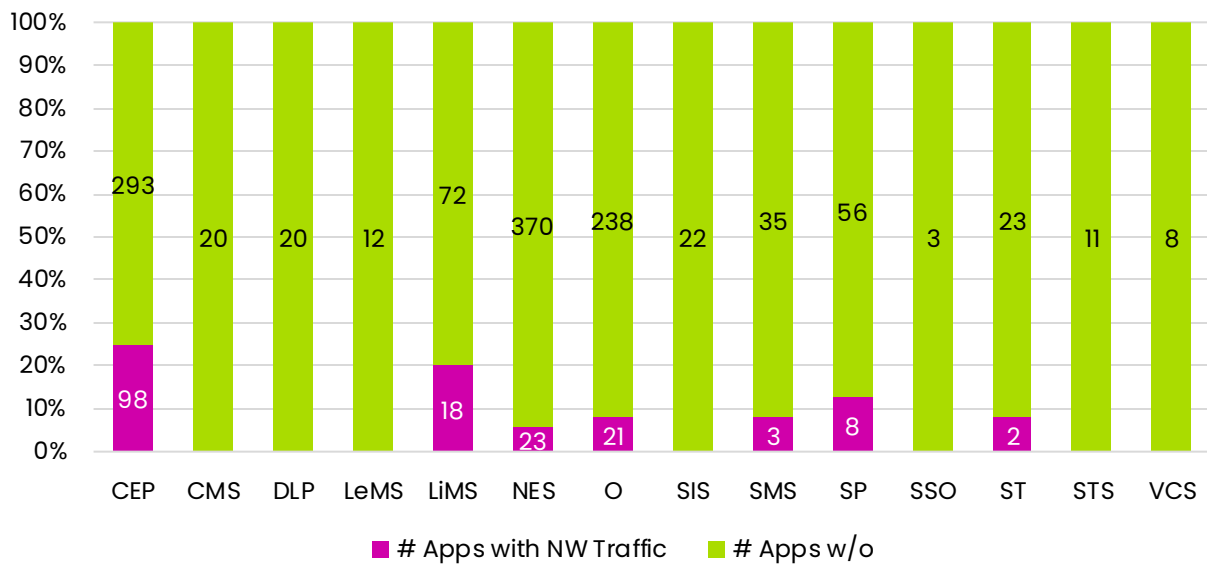


Figure 5.108 — # Apps with NW Traffic to Twitter by Category



### 5.6.6 Platform Data Sharing by OS

- iOS apps more frequently send data to all six large platforms as compared to Android apps. The existence of a discrepancy suggests that future research should look into how development practices differ across platforms.

Figure 5.109 — Apps with NW Traffic to Adobe by OS

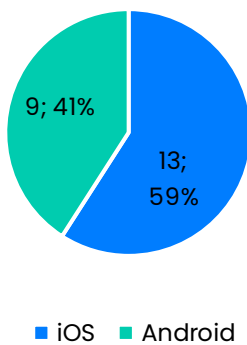


Figure 5.110 — Apps with NW Traffic to Amazon by OS

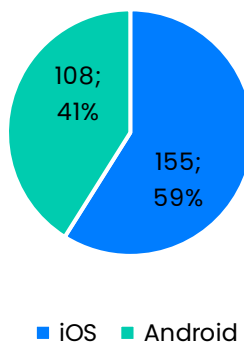


Figure 5.111 — Apps with NW Traffic to Apple by OS

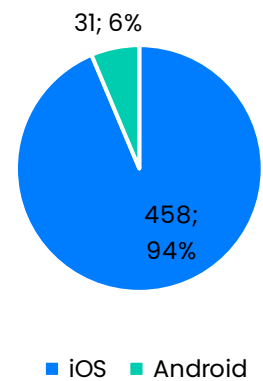
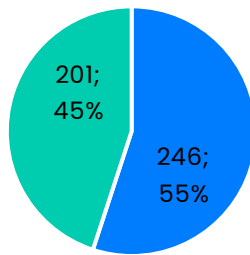
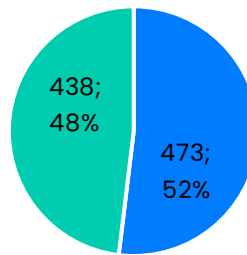


Figure 5.112 — Apps with  
NW Traffic to Facebook  
by OS



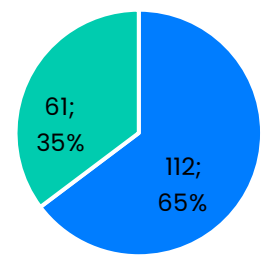
■ iOS ■ Android

Figure 5.113 — Apps  
with NW Traffic to  
Google by OS



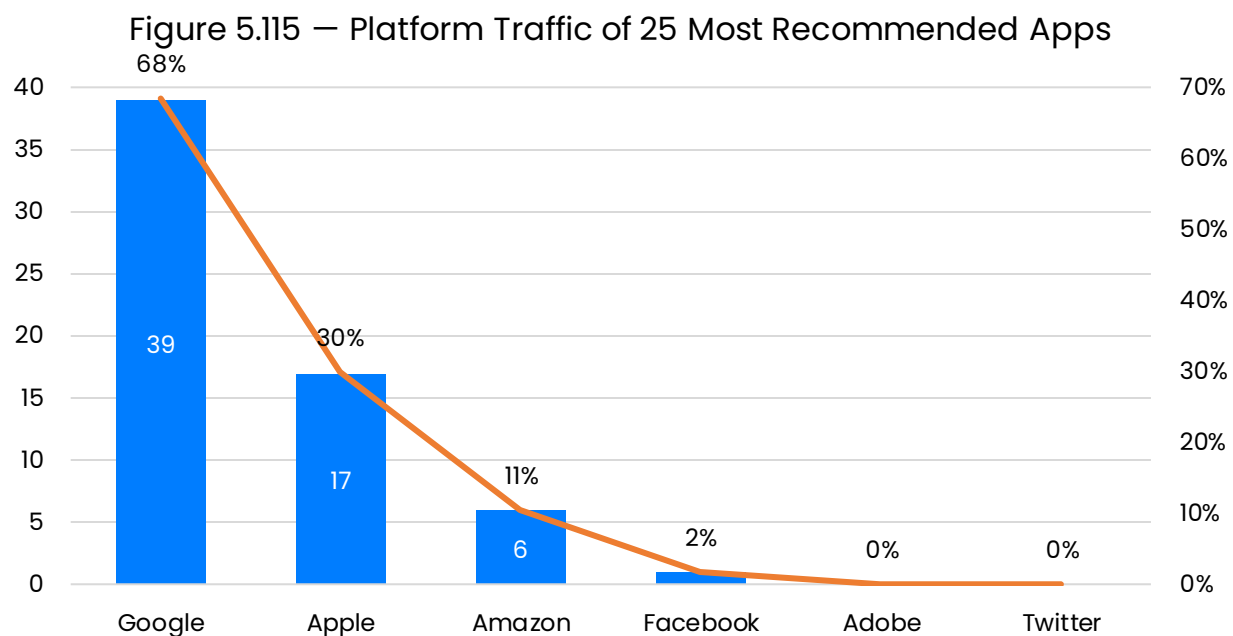
■ iOS ■ Android

Figure 5.114 — Apps  
with NW Traffic to  
Twitter by OS

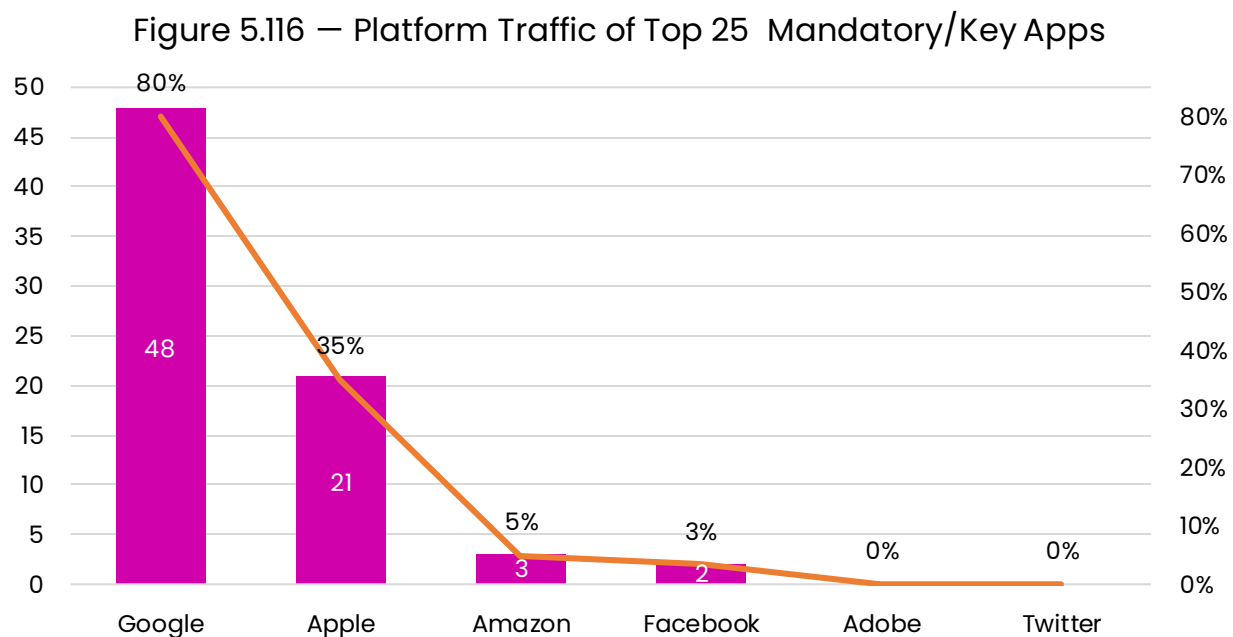


■ iOS ■ Android

### 5.6.7 Platform Data Sharing – Most Recommended Apps



### 5.6.8 Platform Data Sharing – Most Frequently Required Apps



## 5.7 25 Safest Apps

We experimented with several different rating schemas to identify the safest and least safe apps. The one we felt provided the most accurate results was based on both the SDKs in the app and the ISL safety score.

To determine most and least safe apps, apps were evaluated in two parts: (1) SDK Composite Scores, and (2) ISL safety score. For 1516 apps, a composite SDK score was determined. This score was calculated as follows:

$$\text{SDK Composite Score} = [(\# \text{ of Very High Risk SDKs}) + (\# \text{ of High Risk SDKs} / 2) + (\# \text{ of Medium Risk SDKs} / 4) + (\# \text{ of Neutral Risk SDKs} / 8)]$$

The apps were then sorted by SDK Composite Score.

**Least Safe:** To qualify as "Least Safe", the apps had to have the highest possible SDK Composite Score AND an ISL safety score of "Do Not Use".

**Safest:** To qualify as "Safest", the apps had to have the lowest possible score AND an ISL rating of "Some Risk", our best score.

### 5.7.1 Safest Apps Key Findings

- **100%** of the safest apps were **Generic** apps, and most of the apps were **O (46%), NES (25%)**, and the remainder were split between SP, LiMS and CMS apps.
  - There is a fairly diverse range of categories, with representation from three core edtech categories.
- **60%** of the safest apps were **Android** apps.
- Note that **no CEP** apps were in the top 25 safest apps.

**Table 5.5 25 Safest Apps**

App Name	Platform	Category	Developer
<b>Manybooks</b>	iOS	NES	Advertical Media LLC
<b>Safe Puzzle</b>	Android	O	Allen Dikio
<b>Capstone Interactive</b>	iOS	O	Capstone Global Ltd.
<b>Virtual Hope Box</b>	iOS	NES	Defence Health Agency and US DoD
<b>DuckDuckGo Privacy Browser</b>	iOS	O	DuckDuckGo
<b>LibAnywhere</b>	Android	LiMS	LibraryThing
<b>Sparky's Firehouse</b>	iOS	O	National Fire Protection Association
<b>Sparky's Fun House</b>	iOS	O	National Fire Protection Association
<b>Sparky's Firehouse</b>	Android	O	National Fire Protection Association
<b>Sparky's Fun House</b>	Android	O	National Fire Protection Association



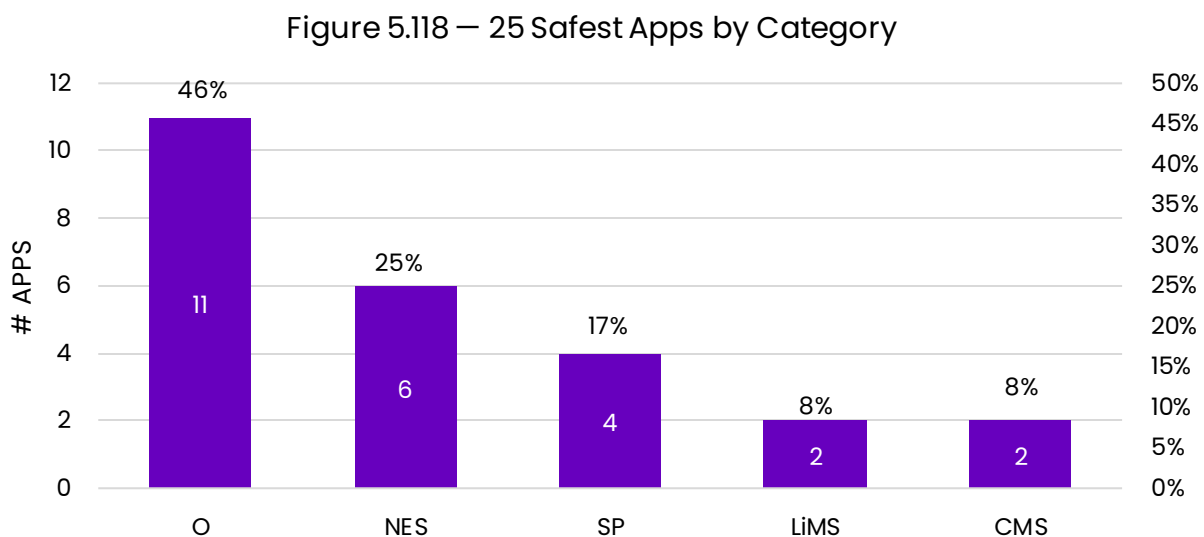
<b>Safe2Tell CO</b>	iOS	SP	Navigate 360, LLC
<b>P3 Tips</b>	Android	SP	Navigate 360, LLC
<b>Stellarium Mobile – Star Map</b>	Android	O	Noctua Software Ltd.
<b>Rainy Mood Lite</b>	Android	NES	Plain Theory, Inc.
<b>phyphox</b>	Android	O	RWTH Aachen University
<b>Safe Schools Helpline</b>	Android	SP	Security Voice Inc.
<b>Caustic 3</b>	Android	NES	SingleCellSoftware
<b>SaferMT</b>	iOS	SP	Sprigeo
<b>Lexington Public Library</b>	Android	LiMS	The Library Corporation
<b>CareerInfo</b>	iOS	NES	U.S. Department of Labor
<b>CareerInfo</b>	Android	NES	U.S. Department of Labor
<b>Yearbook Snap</b>	iOS	CMS	Walsworth Publishing Company, Inc.
<b>Yearbook Snap</b>	Android	CMS	Walsworth Publishing Company, Inc.
<b>Zoo-phonics 1. The Address Boo</b>	Android	O	Zoo-phonics
<b>Zoo-phonics 2. The Zoo-phonics</b>	Android	O	Zoo-phonics

### 5.7.2 24 Safest Apps by Custom vs. Generic

Figure 5.117 — 25 Safest Apps – Generic vs. Custom

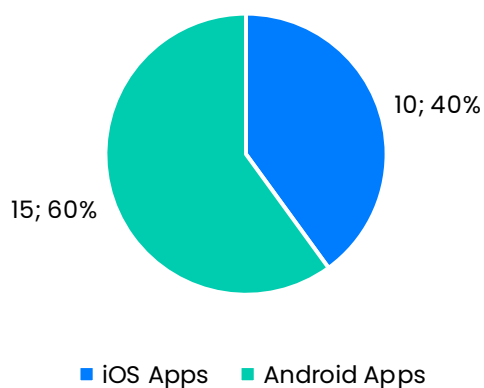


### 5.7.3 25 Safest Apps by Category



### 5.7.4 25 Safest Apps by OS

Figure 5.119 — 24 Safest Apps by OS



## 5.8 25 Least Safe Apps

### 5.8.1 25 Least Safe Apps Key Findings

- **88%** of the least safe apps were **Generic**.
- The least safe apps were **NES (68%), O(20%), and CEP (12%)**.
- **80%** of the least safe apps were **Android** apps.

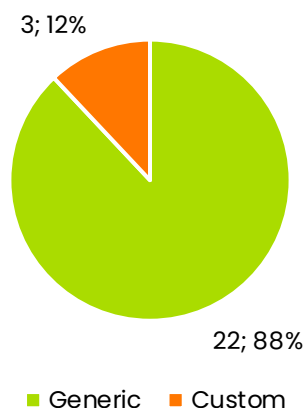
**Table 5.6 25 Least Safe Apps**

App Name	Platform	Category	Developer
<b>Wattpad – Read &amp; Write Stories</b>	Google	NES	Wattpad Corp.
<b>Happy Color® – Color by Number</b>	Google	NES	X-FLOW LTD
<b>Colorfy: Art Coloring Game</b>	iOS	O	Wildlife Studios
<b>Wordle!</b>	Google	O	Lion Studios, LLC
<b>Flight Pilot: 3D Simulator</b>	Google	NES	Fun Games for Free
<b>Wattpad – Read &amp; Write Stories</b>	iOS	NES	Wattpad Corp.
<b>USA TODAY</b>	Google	NES	Gannett Co., Inc.
<b>Jamestown Sun E-paper</b>	Google	NES	Forum Communications Company
<b>FlipaClip: Create 2D Animation</b>	iOS	NES	Visual Blasters, LLC
<b>CNN Breaking US &amp; World News</b>	Google	NES	Warner Media Companies
<b>Recolor – Adult Coloring Book</b>	Google	NES	Kuuhubb Oy
<b>Flight Pilot Simulator 3D!</b>	iOS	NES	Fun Games for Free
<b>The Wall Street Journal: Busin</b>	Google	NES	Dow Jones & Company, Inc.
<b>FlipaClip: Create 2D Animation</b>	Google	NES	Visual Blasters, LLC
<b>Vestavia Hills Athletics</b>	Google	CEP	SIDEARM Sports, a Learfield Company
<b>Likewise: Entertainment Picks</b>	Google	O	Lightbot
<b>Colorfy: Coloring Book Games</b>	Google	O	Wildlife Studios
<b>Key Ring: Your mobile wallet</b>	Google	NES	InMarket Media LLC
<b>Recolor – Adult Coloring Book</b>	iOS	NES	Kuuhubb Oy
<b>The New York Times</b>	Google	NES	The New York Times Company
<b>Titans Athletics</b>	Google	CEP	From Now On, LLC
<b>Westside Warriors</b>	Google	CEP	From Now On, LLC
<b>AP News</b>	Google	NES	The Associated Press

<b>Sober Grid - Social Network</b>	Google	NES	Sober Grid, Inc
<b>Babbel - Learn Languages</b>	Google	O	Babbel GmbH

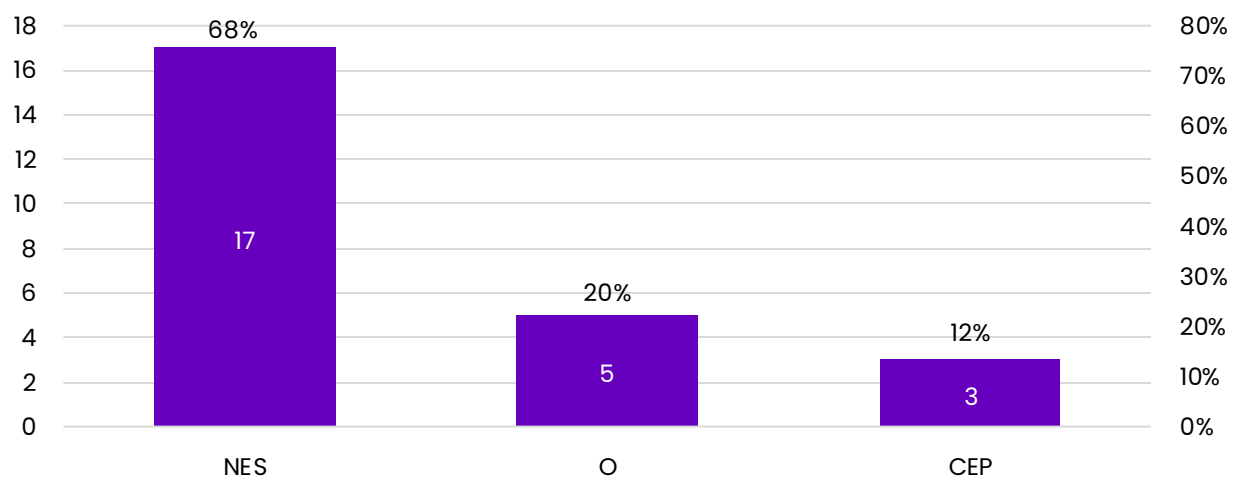
## 5.8.2 25 Least Safe Apps by Custom vs. Generic

Figure 5.120 — 25 Least Safe Apps - Generic vs. Custom



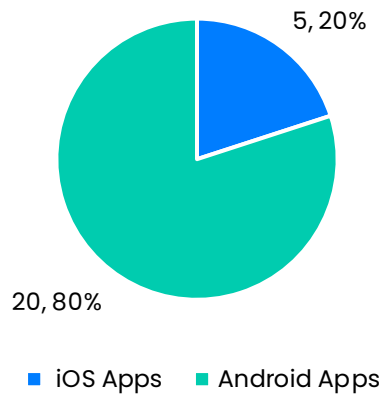
## 5.8.3 25 Least Safe Apps by Category

Figure 5.121 — 25 Least Safe Apps by Category



#### 5.8.4 25 Least Safe Apps by OS

Figure 5.122 — 25 Least Safe Apps by OS



## 6 ISL Recommendations

### 6.1 Schools and Local Educational Agencies

- Schools and LEAs need substantial additional support to better navigate the increasingly complicated and unsafe edtech.
  - Combined with the increasing cybersecurity attacks on LEAs, more financial support and resources are needed.
- Schools should be aware that app publishers are behaving in an unsafe manner and exercise caution about adopting new technologies.
  - When it comes to technologies, until edtech has a safety culture, less is more.

### 6.2 Edtech Developers

- We see no evidence that edtech developers prioritize safety. The industry needs to join the conversation on software product safety for students.
- Custom, CES type apps must be made safer for students. Being both mandatory and commissioned directly by schools, these should be among the safest apps for students, but that isn't the case.
  - The good news is that a handful of key developers provide most of these apps to schools across the US. They should be able to readily make the necessary safety improvements.
- Advertising must be removed from all edtech apps recommended or required by public schools in the US.
- For developers of edtech who also own advertising related technologies, we suggest that they be required to use a unique domain for the two types of products.
  - For instance, Google should create a new domain, like "googlekids.com", expressly for use in their products that will be used by K12 students.

## 7 Research Methodology

This research focuses on all technology used by K12 schools included in the sample. This benchmark covers public and private schools across all 50 states in the United States, and the District of Columbia. This study covered 1722 apps in use by the sampled 663 schools, covering a total population of approximately 455,882 students. Schools typically have both Android and Apple iOS version of an app, and both versions were analyzed when available.

### 7.1 School Selection Methodology

#### 7.1.1 Sampling Procedure

To observe K12 Edtech app usage, 663 total school websites were reviewed by researchers. This sample size was chosen through a power analysis accepting 5% type 1 error and 1.5% margin of error. This suggests a sample size of 680, but in the interest of balanced representation across grades, we settled on 663. In selecting these schools, we made the following four design choices:

- A. Representative and balanced sampling across the 50 states.
- B. Representative and balanced sampling within the following school types: elementary school, middle school, high school.
- C. Sample schools proportionally to the locale distribution of schools in the corresponding state.
- D. Only sample schools with over 200 students. Note that we chose this threshold in order to maximize the impact of this benchmark, but this threshold may reduce the number of rural schools sampled.

To satisfy points A and D, we stratified our sample by the 50 states to account for possible differences in technology usage across the 50 states. To ensure balanced representation, we filtered schools with less than 200 students and then sampled 13 schools within each state. For these 13 schools, we decided to sample 12 public schools and 1 private school, 8% of our sample size, approximating the actual private school enrollment of about 9% of all students in the US<sup>5</sup>. Due to lack of technology use disclosure on private schools' websites, we chose to not strive for representation within our sample of private schools as our results would be biased and likely incorrect. Therefore, the next two steps only apply to public schools.

To satisfy point B, these 50 subpopulations (stratum) were then stratified by school type to account for differences in technology usage across grade levels.

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<sup>5</sup> [https://nces.ed.gov/programs/projections/projections2021/tables/table\\_01.asp](https://nces.ed.gov/programs/projections/projections2021/tables/table_01.asp)

Again, to ensure balanced representation for public schools we sampled 4 schools of each type.

To satisfy point C, we chose to perform a weighted random sample within each  $\{state, school\}$  type subpopulation. These weights were assigned based on the proportion of schools within the corresponding subpopulation that were in each locale. For example, if a subpopulation had 4 schools (2 rural, 1 suburban, 1 urban) a higher weight would be assigned to the rural schools.

In layman terms, we split the population of all schools in the US to 150 sub-populations each corresponding to a particular  $\{state, school\}$  combination. Within each of these 150 sub-populations 4 public schools were sampled where this sampling was weighted to represent the locale distribution of each respective subpopulation.

### 7.1.2 Sampling Procedure in Practice

Using the above sampling procedure, we used files exported from the [National Center for Education Statistics](#) (NCES) to characterize each population and subpopulation. NCES offers csv files containing every school within a particular state. Therefore, we had direct access to the full state subpopulations. Next, to form the school type subpopulations within these state files, each school was assigned to one or more school types based on their grade offerings. Schools were categorized using the following schema:

- Elementary Schools: NCES' *Low-Grade* designation is between PK and 6 and NCES' *High-Grade* designation is between 1 and 6.
- Middle Schools: NCES' *Low-Grade* designation is between PK and 8 and NCES' *High-Grade* designation is between 6 and 8.
- High Schools: NCES' *Low-Grade* designation is between PK and 12 and NCES' *High-Grade* designation is above 8.

This establishes the three subpopulations we want to sample from  $\{state, elementary\}$ ,  $\{state, middle\}$  and  $\{state, high\}$ . Next, within each of these subpopulations, we tally up the number of schools within each locale based on the NCES classifications and formulate the sampling weights which define the probability that each school would be selected using our random sample. Finally, the sampling was performed using a weighted random sample computer program forming a representative sample for all schools in the United States with over 200 students.

For example, for New York, we downloaded a dataset containing each school in the state of New York; this dataset is the population of all schools in the New York



subpopulation. Then each school was categorized using the above schema and the weights were formulated.

## 7.2 App Selection

For each school in the sample, we utilized several methods to determine the technologies and apps in use by the school or school district, including:

- School or school district website manual discovery (looking for “Technology” information, for example).
- Site-search on the school or district website for key terms like “apps”.
- Searching AppFigures for the school name or school district name.

Note that we did not contact schools to confirm the technologies found in this way.

### 7.2.1 Key/Mandatory Apps

Through the app identification process, we observed that some apps were school- or even district-wide deployments, as evidenced by prominent positions on websites. This could be in the form of dedicated login buttons or menu options on the school website, or dedicated training pages or modules [for specific technology]. Note that we did not confirm if the technologies were, in fact, mandatory with the schools.

## 7.3 Data Collection

In order to answer the research questions described in Section 4.5 we performed two different types of data collection:

- School data collection, and
- App data collection.

### 7.3.1 School Data Collected

For each school in the sample, we recorded the following information from NCES:

1. # of students
2. School District
3. Geographical Description (Urban / Suburban / Rural)
4. Majority Ethnicity/Race
5. Income Level
6. Public/private
7. Grade levels

To gauge school use of technology, we recorded the following information from school and school district websites:

1. List of apps used by school

- a. An indication for each app if it was considered as “mandatory” or “key technology” for the school.
2. Technology Vetting practices
3. Notice and Consent practices for data collection
4. Presence of School-issued devices, and privacy policies for same
5. Number and riskiness of trackers on school website and names of aggregating companies tracking. Specifically, we used EFF’s Privacy Badger and recorded the number and company behind the red and yellow flagged trackers.<sup>6</sup>

“Red means that content from this third party domain has been completely disallowed.

Yellow means that the third party domain appears to be trying to track you, but it is on Privacy Badger’s cookie-blocking “yellowlist” of third party domains that, when analyzed, seemed to be necessary for Web functionality. In that case, Privacy Badger will load content from the domain but will try to screen out third party cookies and referrers from it.”

6. Platform provider for website
7. Whether there is advertising present on the school website

### 7.3.2 App Data Collected

For analyzing apps, two primary methods of data collection were used:

- Metadata collection, using information found in the app stores, privacy policy, and in the AppFigures database.
- Observed App Behaviors, from using the app, including capturing network traffic while using the app.

#### 7.3.2.1 App Metadata Collected

ISL utilized tools from [AppFigures.com](https://appfigures.com), a mobile app analytics firm which provides a database of software development kits (SDKs), permissions, and other data about mobile apps across all the major app stores. A crucial part of the research methodology was to use AppFigures to study both the number and the type of SDKs included in each app. In addition, we utilized our proprietary ISL SDK Risk Dictionary which provides an ISL Safety Score for every SDK based on its potential for harm.

The following metadata was collected for each app identified as being used by a school in the sample set:

1. App Name

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<sup>6</sup> EFF Privacy Badger (<https://privacybadger.org/> )

2. App Store link
3. App Developer
4. Operating System
5. Custom or Generic app
6. Edtech Category/Classification
7. App Age Level
8. App Release Date
9. App Last Updated Date
10. # downloads (Android only)
11. App Functions
12. SDK list – collected for each app:
  - a. Total # of SDKs in the app,
  - b. Distribution of SDKs by ISL Safety Score (Neutral Risk, Medium Risk, High-Risk, Very High Risk [Data Broker])
13. Data Accessible by all data controllers and processors as determined by evaluating app permissions.
14. Certifications (e.g. iKeepSafe)
15. Whether or not the iOS privacy label is present (iOS apps only)
16. Privacy Policy URL
  - a. Whether the PP has an explicit exclusion for children

### 7.3.2.2 Observed App Behaviors

ISL used two techniques to measure actual app behaviors:

- Exercising/using the app itself, and
- Observing network traffic to/from the app.

#### 7.3.2.2.1 Data From App Usage

The following information was obtained by using the apps:

1. Whether the app requires login credentials for use
2. Whether unusual/unsafe login behaviors were observed
3. If the app has a “do not sell” [my data] button (California regulation)
4. If the app breaks after a “monster in the middle” attack
5. Whether any dangling domains (unresolved urls) were observed
6. Whether any hijacked domains were observed
7. Whether the app was built using WebView methods
8. Whether advertising is present in the app
9. Whether retargeting ads are present in the app
10. Whether MaxPreps is included in the app (MaxPreps is a problematic school sports service we first identified in this report; the service is ad-funded and still contains retargeting ads)

11. Whether Adobe is present in the UI
12. Whether Amazon is present in the UI

#### **7.3.2.2.2 Network Data Traffic**

To measure network traffic, the team utilized Charles Proxy for iOS apps and PCAPdroid for Android apps. These are debugging tools that allow the auditor to capture and view all the HTTP and SSL/HTTPS traffic between the mobile app and external servers.

From this observed network traffic we can derive the list of unique domains, which shows which entities are, in fact, receiving information, and what information is being shared with third parties.

For this phase of reporting, we have distilled the following information directly from the app's network traffic:

1. If Adobe is present in network traffic
2. If Amazon is present in network traffic
3. If Apple is present in network traffic
4. If Facebook is present in network traffic
5. If Google is present in network traffic
6. If Twitter is present in network traffic

More information will be gleaned from ongoing analysis of the network traffic logs.

## 8 Appendix A: K12 Edtech Typology

The following Edtech classification schemas were considered in deriving our final Edtech typology:

- Valuates Reports': K-12 Education Technology Market Research Report, January 2022, [K12 Education Technology Market Size, Share, Growth, Forecast 2021 - 2026 | Valuates Reports](#)
- EdSurge Product Index, [Homepage | EdSurge Product Index](#)
- LMS Hero, "What Is Edtech and How Is It Shaping the Future of Learning", [What Is Edtech and How Is It Shaping The Future Of Learning - LMS Hero](#)
- "Understanding the Edtech Product Landscape [+Infographic]", Ashmeet Singh, April 19, 2018, <https://medium.com/the-edtech-world/edtech-landscape-743716608675>
- EdtechImpact.com Categories, <https://edtechimpact.com/categories>
- Learn Platform, "Edtech Top 40 Mid-Year Report 2021-2022", [Edtech Top 40 Mid-Year Report – LearnPlatform](#)
- G2 Edtech Categories, <https://www.g2.com/categories/education>

After reviewing all the references above, we chose to use the G2 Edtech Categories as the basis for classifying apps in our benchmark, but adding two new categories: Other, for educational-other apps, and NES for Non-Education Specific apps.

### **Classroom Messaging Software (CMS)**

- (1) Include multimedia messaging options
- (2) Provide mass messaging and push notifications
- (3) Facilitate two-way parent-teacher messaging
- (4) Sync messages to multiple platforms, including email
- (5) Examples: PowerSchool Mobile, School Messenger

### **Community Engagement Platform (CEP)**

- (1) Provide tools for administrators and parents to communicate
- (2) Include a news feed of recent things happening at the school, for the benefit of both students and parents
- (3) Primary function is to serve as a communication platform
- (4) Not classified as something else (like SMS)
- (5) Examples: Nearpod, Minga

### **Digital Learning Platform (DLP)**

- (1) Be designed for use by instructors at K-12 schools or higher education institutions
- (2) Deliver interactive educational lessons

- (3) Include multimedia elements designed to increase student engagement
- (4) Personalize the learning experience for each student
- (5) Generate reports based on student performance data (Optional)
- (6) Examples: Edmodo, Quizizz

### **Learning Management System (LeMS)**

- (1) Provide a platform for educators to deliver online course content to students
- (2) Distribute assignments to students and allow instructors to grade student work
- (3) Administer digital assessments to students
- (4) Facilitate individualized feedback on student work, such as through written comments or grading rubrics
- (5) Generate performance dashboards for tracking student progress
- (6) Contain gradebook functionality or integrate with third-party gradebooks
- (7) Examples: Canvas Student, Google Classroom, Schoology

### **Library Management Software (LiMS)**

- (1) Include a database that can be used to store and manage information on different types of content assets (books, magazines, movies, music records, and more) in different formats (print, electronic, video, etc.)
- (2) Manage patron and member information including profiles, present and past loans, payments, and penalties
- (3) Allow users to find information from public sources like OPAC (Online Public Access Catalog) or WorldCat
- (4) Manage asset inventory and loans across multiple physical locations
- (5) Provide statistics on loans, inventory, late returns, or lost documents
- (6) Examples: Destiny Discover, hoopla, SORA, Libby

### **Non-Education Specific (NES)**

- (1) Either not an edtech application or does not fit any categories
- (2) Add subcategories of NES
  - a. News
    - i. Examples: NY Times, KQED
  - b. References
    - i. Examples: TED talks, Encyclopedia Britannica
  - c. Productivity
    - i. Examples: Outlook, Google Documents

### **Other (O)**

- (1) Edtech/edtech-adjacent applications that do not fit criteria for other edtech categories (e.g. educational games, music lesson apps)
- (2) Add subcategory for Games.
  - a. Examples: zoo-phonics, Teach Your Monster to Read
- (3) Add subcategory for Sports
  - a. Examples: ScoreStream, SBLive Sports, NFHS Network

### **School Transportation Software (STS)**

- (1) Be designed to manage school transportation programs
- (2) Create optimized bus routes and schedules
- (3) Assign students and drivers to bus routes
- (4) Examples: WheresTheBus, Z Pass+, Versatrans My Stop

### **Safety Platform (SP)**

- (1) Allows reporting of school specific safety information to school security personnel
- (2) Reporting is anonymous
- (3) Examples: WeTip, Vector Alert, P3 Tips

### **Single Sign On (SSO)**

- (1) Allows users to use one login to access multiple applications or databases in one portal
- (2) Example: Clever, ClassLink LaunchPad

### **School Management Software (SMS)**

- (1) Provide tools to improve staff communication
- (2) Have features designed to improve efficiency
- (3) Include functionality designed to help manage school operations in areas such as facilities, IT management, program management, document management, attendance, food service and payment technologies, hall pass management.
- (4) Examples: Nutrislice, MySchoolBucks

### **Student Information System (SIS)**

- (1) Monitor relevant student data
- (2) Include a portal for parents to access information about their students
- (3) Offer reporting capabilities
- (4) Handle student admissions
- (5) Provides a module for school staff
- (6) Examples: OnCourse Connect, Skyward Mobile Access

## **Study Tools (ST)**

- (1) Have features specifically for test preparation
- (2) Include various study methods
- (3) Be accessible for students and educators
- (4) Examples: Sporcle, ProProf Quizzes, Kahoot!

## **Virtual Classroom Software (VCS)**

- (1) Contain live video streaming capability
- (2) Provide screen sharing
- (3) Contain an online whiteboard feature
- (4) Provide a comprehensive online classroom environment designed for use by educational institutions as well as individual teachers and tutors
- (5) Stream live rich media interactive presentations
- (6) Examples: Zoom, Microsoft Teams, Google Meet



## 9 Appendix B: Schools in Sample

### ALABAMA

Breitling Elementary School  
Fayette County High School  
Green Acres Middle School  
Haleyville Elementary School  
Hartselle Junior High School  
Highland Garden Elementary School  
Jemison High School  
Martin Luther King Jr Elementary School  
North Jefferson Middle School  
Pell City High School  
Sardis Middle School  
Trinity Presbyterian School  
Vestavia Hills High School

### ALASKA

Alaska Middle College School  
Anchor Lutheran School  
Bettye Davis East Anchorage High School  
Central Middle School of Science  
Dena'ina Elementary School  
Kodiak Middle School  
Nome-Beltz Middle/High  
Ocean View Elementary  
Russian Jack Elementary  
Sitka High School  
Skyview Middle School  
Snowshoe Elementary  
Wendler Middle School

### ARIZONA

TAPBI (Technology Assisted Project-Based Instruction) //// Now Tempe Union Online  
Bogle Junior High School  
Sierra Linda High School  
Sunnyslope Elementary School  
Canyon Springs STEM Academy  
High Desert Middle School  
Marshall Ranch Elementary School  
Pioneer Preparatory - A Challenge Foundation  
Sequoia Elementary School  
Frances Brandon-Pickett Elementary  
Cesar Chavez Elementary  
San Miguel High School  
Alta Vista High School

## **ARKANSAS**

Bismark Middle School  
Chicot Elementary School  
Estem Elementary School  
Harmony Grove High School  
Jacksonville High School  
Joe T.Robinson Middle School  
Lavaca Middle School  
Mayflower Middle School  
Northside High School  
Reagan Elementary School  
Stewart Elementary School  
The New School  
Westside High School

## **CALIFORNIA**

Beattie Middle  
Cesar E. Chavez High  
Charles Wright Elementary  
Diamond Bar High  
Downtown Business High  
Hamilton Middle  
Hiram W. Johnson High  
McKee Middle  
Northwood Elementary  
Rio Vista Middle  
San Benito Elementary  
St John Catholic School  
Village Elementary Charter

## **COLORADO**

Aurora West College Preparatory Academy  
Carmody Middle School  
Crown Point Charter Academy  
Dolores Secondary School  
Iowa Elementary School  
Lewis-Palmer Elementary School  
Mitchell Elementary School  
Most Precious Blood School  
Mountain Phoenix Community School  
Mountain Vista High School  
Sanford Elementary School  
Sky View Middle School  
Union Colony Preparatory School

## **CONNECTICUT**

Central High School  
Fletcher W. Judson School  
High School In The Community

Intermediate School  
King Philip Middle School  
New Fairfield High School  
Norte Dame Catholic High School  
Pond Hill School  
Putnam Middle School  
Reed Intermediate School  
Thompson Middle School  
Tolland Intermediate School  
Waterford High School

#### **DELAWARE**

Bedford (Gunning) Middle School  
Clayton Intermediate School  
Dickinson (John) School  
duPont (Alexis I.) High School  
Fred Fifer III Middle School  
Glasgow High School  
John Bassett Moore Intermediate School  
Lorewood Grove Elementary School  
Nellie Hughes Stokes Elementary School  
Ross (Lulu M.) Elementary School  
Smyrna High School  
St May Magdalen School  
Talley Middle School

#### **DISTRICT OF COLUMBIA**

Anacostia HS  
Bridges PCS  
Charles Hart MS  
Dunbar HS  
Eastern HS  
Friendship PCS - Collegiate Academy  
Kelly Miller MS  
Randle Highlands ES  
School-Within-School at Goding  
ST Peter School  
Turner ES  
Washington Global Pcs  
Washington Latin PCS - MS

#### **FLORIDA**

Abess Park Elementary School  
Avant School of Excellence  
Beacon Cove Intermediate School  
Braden River High School  
Homestead Middle School  
Lake George Elementary  
Lake Nona High School

Lake Wales Senior High School  
Plant City High School  
Rockway Middle School  
Tradewinds Middle School  
Wakulla Middle School  
Williston Elementary School

#### **GEORGIA**

Alto Park Elementary School  
Bonaire Middle School  
Central High School  
Central Middle School  
East Hall High School  
East Laurens Middle School  
G.W. Carver High School Early College  
New Creation Christian Academy  
Richmond Hill Middle School  
Smith-Barnes Elementary School  
Spalding High School  
Woodlawn Elementary School  
Worth County Elementary School

#### **HAWAII**

Ewa Makai Middle School  
Henry Perrine Baldwin High School  
Hokulani Elementary School  
King Kekaulike High School  
Major General William R Shafter Elementary  
School  
Maui Waena Intermediate School  
Mililani Uka Elementary School  
Sacred Hearts School & Early Learning  
Center  
Waiakea Intermediate School  
Waianae Elementary School  
Waimea Canyon Middle School  
Waipahu High School  
West Hawaii Explorations Academy

#### **IDAHO**

East Valley Middle School  
Joplin Elementary School  
Marsh Valley High School  
Nampa Christian Schools  
Renaissance High School  
Sawtooth Elementary School  
Shadow Hills Elementary  
Skyview High School  
St. Maries Middle School

Taylorview Middle School  
Timberline High School  
Van Buren Elementary School  
Village Leadership Academy

#### **ILLINOIS**

Ascension Elementary School  
Brooks College Prep Academy HS  
Everett F Kerr Middle School  
Golf Middle School  
Gompers Junior High School  
Hinsdale South High School  
Lake Forest High School  
Lincoln Elem School  
Lyon Magnet Elementary School  
Pittsfield High School  
Pleasant Ridge Elem School  
Tonti Elem School  
Washington Middle School

#### **INDIANA**

Avon Intermediate School East  
Bittersweet Elementary School  
Central Catholic  
East Noble Middle School  
Hamilton SE Int and Jr High Sch  
Michael Grimmer Middle School  
Northeast Dubois Jr/Sr High School  
Prince Chapman Academy  
Rising Sun High School  
Scottsburg Senior High School  
Stonegate Elementary  
Tipton High School  
Zionsville Middle School

#### **IOWA**

Camanche Elementary  
Carlisle Middle School  
Hoover Middle School  
Indianola High School  
Jordan Creek Elementary School  
Manson Northwest Webster Elementary  
MOC-Floyd Valley High School  
Morning Star Academy  
PCM Middle School  
Storm Lake Middle School  
Timber Ridge Elementary  
West High School  
West High School

## **KANSAS**

Blessed Sacrament Catholic School  
Burlington Elementary School  
Cleaveland Traditional Magnet Elementary  
Dodge City High School  
Dwight D. Eisenhower Middle School  
Hesston Middle  
Jefferson West High  
North High  
Pioneer Trail Middle School  
Richard Warren Intermediate School  
Roosevelt Elem  
Stilwell Elementary  
Wamego High

## **KENTUCKY**

Buckhorn School  
Crums Lane Elementary  
Garrard Middle School  
Johnson Central High School  
Lafayette High School  
Ockerman Elementary School  
Owensboro Innovation Middle School  
Red Oak Elementary  
South Marshall Middle  
St. Francis School (Now Francis Parker School)  
Summit View Academy  
Symsonia Elementary School  
Walton-Verona High School

## **LOUISIANA**

Arcadian Middle School  
Bayou Blue Middle School  
D.C. Reeves Elementary School  
Good Hope Middle School  
Grayson Elementary School  
Loranger Middle School  
Meaux Elementary School  
New Orleans Center for Creative Arts  
Northeast High School  
Parkway High School  
St Peter Chanel Interparochial School  
Tanglewood Elementary School  
Woodlawn High School

## **MAINE**

Biddeford Middle School  
C K Burns School

Ellsworth High School  
Eva Hoyt Zippel School  
Frank H Harrison Middle School  
Manchester School  
Maranacook Community High Sch  
Oak Hill Middle School  
Orono High School  
Skowhegan Area Middle School  
Thornton Academy  
Vickery School  
Wells High School

#### **MARYLAND**

Bayside Elementary School  
Benjamin Stoddert Middle School  
Carver Vocational-Technical High  
Cherokee Lane Elementary  
Chevy Chase Elementary  
Ellicott Mills Middle  
Lillie May Carroll Jackson School  
Martin Luther King Jr. Middle  
Maurice J. McDonough High School  
Milbrook Elementary  
Montgomery Blair High  
Oakdale High  
Rockbridge Academy

#### **MASSACHUSETTS**

Belchertown High  
Brookwood School  
Elmwood  
Gates Middle School  
Henri A. Yelle  
O'Bryant School Math/Science  
Tracy  
Turkey Hill Elementary School  
Upper Cape Cod Regional Vocational  
Technical  
Vassal Lane Middle School  
Weston Middle School  
William R. Peck School  
Winthrop High School

#### **MICHIGAN**

Benton Harbor High School  
Boyd W Arthurs Middle School  
Boyne City Middle School  
Carl T Renton Jr High School  
Detroit Cristo Rey High School

Garber High School  
Gladstone Area Middle School  
Leslie High School  
Onaway Elementary School  
Seminole Academy  
Troy High School  
William A Pearson Elementary  
Winchell Elementary School

#### **MINNESOTA**

Anderson Elementary  
Crossroads Montessori  
Deer River Secondary  
Joseph Nicollet Middle School  
Lakeview Secondary  
Minnehaha Academy - Upper School  
Monticello Senior High  
Oakwood Elementary  
Pequot Lakes Middle  
Pioneer Ridge Middle School  
Royalton Middle School  
St. Louis Park Senior High  
Sun Path Elementary

#### **MISSISSIPPI**

Betty Mae Jack Middle School  
Brandon High School  
Callaway High School  
Charleston High School  
Clinton Jr High School  
East Tate Elementary School  
Edna M Scott Elementary School  
Madison Station Elementary School  
Mendenhall Junior High School  
Oakhurst Intermediate Academy  
R.H. Long Booneville Middle School  
Resurrection Catholic School - High School  
Campus  
Tishomingo County High School

#### **MISSOURI**

Cold Water Elem.  
East Elem  
Excelsior Springs 40  
Holy Cross Academy  
Jackson Middle  
Little Blue Elementary  
Marshall SR. High  
Monroe City R-I High



Pleasant View Middle  
Poplar Bluff Jr. High  
Portageville Elem.  
Ritenour Sr. High  
Thomas Jefferson Middle

#### **MONTANA**

Browning Middle School  
Corvallis High School  
Dillon Middle School  
Emerson School  
Fred Moodry Intermediate  
Fred W Graff School  
Glacier High School  
Malta K-5  
Poplar High School  
Ronan Middle School  
Shepherd High School  
Trinity Lutheran School  
Valley View School

#### **NEBRASKA**

Barr Middle School  
Crete Middle School  
Douglas Co West High School  
Eastridge Elementary School  
Mc Cook Junior High School  
Norris Intermediate School  
Norris Middle School  
Northwest High School  
Paddock Road Elementary School  
Secondary Sch At Raymond  
SS Peter & Paul Elementary School  
Westmoor Elementary School  
Winnebago High School

#### **NEVADA**

Albert M. Lowry High School  
Brookfield School  
Cashman James MS  
Centennial HS  
Cheyenne HS  
Democracy Prep at Agassi High  
Diskin P A ES  
Fertitta Victoria MS  
Givens Linda Rankin ES  
Keller Duane D MS  
MAMIE TOWLES ELEMENTARY  
Tate Myrtle ES

Webb Del E MS

#### **NEW HAMPSHIRE**

Bedford High School  
Center Woods School  
Gonic School  
Henry J. McLaughlin Jr. Middle School  
Hudson Memorial School  
James Mastricola Upper Elementary School  
Lebanon High School  
Merrimack High School  
Merrimack Valley Middle School  
Nashua High School South  
New Boston Central School  
Pennichuck Middle School  
Saint Christopher Academy

#### **NEW JERSEY**

Crossroads North Middle School  
Frelinghuysen Middle School  
Hawthorne High School  
Merritt Memorial  
Ocean City High School  
Patrick M Villano School  
Russell O. Brackman Middle School  
South River Middle School  
Swimming River School  
Timothy Christian School  
Wayne Valley High School  
West Morris Mendham High School  
Woodland School

#### **NEW MEXICO**

Albuquerque High  
Annunciation Catholic School/Intary School  
Artesia Zia Intermediate  
Cameo Elementary  
Goddard High  
Kirtland Middle  
Los Lunas Middle  
Marshall Middle  
Montessori of the Rio Grande  
Oñate Elementary  
Pojoaque High  
Rio Rancho High  
Thoreau Elementary

#### **NEW YORK**

Arcadia High School  
Cambria Heights Academy

Franklin Delano Roosevelt High School  
German International School New York  
Hamburg Middle School  
Hudson Falls Primary School  
Jefferson Elementary School  
JHS 104 Simon Baruch  
North Elementary School  
Oneonta Middle School  
PS 32 Samuel Mills Sprole  
Tottenville High School  
Turtle Hook Middle School

#### **NORTH CAROLINA**

Carter Community Charter  
Chestnut Grove Middle School  
Christ School  
Cumberland Academy 6-12 Virtual School  
Edward Best Elementary School  
Haw River Elementary  
Heritage Middle School  
Holly Shelter Middle  
North Buncombe Elementary  
Onslow Virtual Secondary  
Porter Ridge Elementary  
Providence Grove High School  
West Lincoln High

#### **NORTH DAKOTA**

Heritage Middle School  
Jamestown Middle School  
Lewis and Clark Elementary School  
Mandan Middle School  
Nativity Elementary School  
Oakes High School  
Rugby High School  
Sunrise Elementary School  
Valley Middle School  
Wahpeton High School  
Washington Elementary School  
Washington Elementary School  
Watford City High School

#### **OHIO**

Benjamin Logan High School  
Brookside Intermediate School  
Buckeye Local High School  
Carlisle Junior High School  
Edgewood Primary School  
Hudson Middle School

Huron High School  
Little Miami Middle School  
Maritime Academy of Toledo The  
Salt Creek Intermediate School  
St. Benedict Catholic School  
W.H. Kirk Middle School  
Waterloo Elementary School

#### **OKLAHOMA**

Cascia hall Preparatory School  
Collinsville MS  
Dickson HS  
Disney ES  
Dove Science Academy MS  
Moore HS  
Morrison ES  
Mustang North MS  
Newman MS  
Oologah-Talala HS  
Tecumseh HS  
Thomas ES  
Verdigris Upper ES

#### **OREGON**

Beatrice Morrow Cannady Elementary  
Capital Christian School  
David Douglas High School  
Eagle Point High School  
East Elementary School  
French Prairie Middle School  
Kalmiopsis Elementary  
Millicoma School  
Mountain View Senior High School  
Myers Elementary School  
North Valley High School  
Talent Middle School  
Whitford Middle School

#### **PENNSYLVANIA**

Freedom HS  
Albert Gallatin South MS  
Apollo-Ridge HS  
Barkley El Sch  
Chichester MS  
Mid Valley Secondary Center  
Perry Lower Intrmd Sch  
Redbank Valley Intrmd Sch  
Roberto Clemente Middle School  
St Gabriel-Sorrowful Virgin School

Swatara MS  
Thomas W Holtzman Jr El Sch  
West Allegheny SHS

#### **RHODE ISLAND**

Anthony Carnevale Elementary  
Dr Jorge Alvarez HS  
East Providence High  
George Hanaford School  
Kent Heights School  
Kickemuit Middle School  
La Salle Academy  
Lincoln Middle School  
Lonsdale Elementary  
Nathanael Greene Middle  
Pilgrim High School  
The Compass School  
West Warwick High School

#### **SOUTH CAROLINA**

Alcorn Middle  
Berea High School  
Blue Ridge Middle  
Dr. Phinnize J. Fisher Middle  
Dutch Fork Elementary  
East Cooper Montessori Charter  
Legion Collegiate Academy  
Maryville Elementary  
Mead Hall Episcopal School  
North Charleston Elementary  
Sandel Elementary  
T. L. Hanna High  
York Preparatory Academy

#### **SOUTH DAKOTA**

Brandon Valley Middle School - 02  
Chamberlain Jr. High - 02  
George McGovern Middle School - 09  
Huron High School  
Martin Elementary  
North Middle School - 35  
Red Cloud Indian School  
Todd County Elementary - 16  
Vermillion High School - 01  
West Central High School - 01  
Westside Elementary - 03  
Winner High School - 01  
Woodrow Wilson Elementary - 17

#### **TENNESSEE**

Austin East High/Magnet  
Bolivar Elementary  
Catlettsburg Elementary School  
Central High School  
Chester County Junior High School  
Columbia Academy  
East Hickman Intermediate School  
East Ridge Middle School  
Farragut Intermediate  
John F. Kennedy Middle  
Lookout Valley Middle / High School  
White House Heritage High School  
Whittle Springs Middle School

#### **TEXAS**

Anna Middle  
Collegiate H S  
D J Red Simon Middle  
Eagle Pass J H  
Garden Ridge El  
Glenn H S  
Greathouse El  
Holy Family Catholic School  
Houston Academy For International Studies  
Iola El  
Mansfield H S  
Noemi Dominguez El  
Ojeda Middle School

#### **UTAH**

Bridger School  
Davis Connect K-6  
Ecker Hill Middle  
J E Cosgriff Memorial Catholic School  
Jordan Ridge School  
Mountain Green Middle  
Mountainside School  
North Sanpete High  
Park City High  
Skyline High  
Timpanogos Middle School  
Timpview High  
West Bountiful School

#### **VERMONT**

Founders Memorial School  
Bennington Elementary School  
Brattleboro Union High School  
Christ the King School

Essex Middle School  
Fairfield Center School  
Green Street School  
Hartford High School  
Lake Region UHSD #24  
Main Street Middle School  
Middlebury Union Middle School  
Orchard School  
South Burlington High School

#### **VIRGINIA**

Alexandria City High  
Annandale High  
Cardinal Forest Elementary School  
Clifton Middle  
Kempsville Middle  
King William High  
Meriwether Lewis Elementary  
Mountain View Elementary School  
Staunton River Middle School  
Tuckahoe Middle  
Twin Springs High School  
Westover Christian Academy  
Willard Model Elementary

#### **WASHINGTON**

Bellevue Christian School  
Edmonds Elementary  
Friday Harbor High School  
James Sales Elementary  
Lakeridge Middle School  
Lewis & Clark Middle School  
McFarland Middle School  
Mossyrock Jr./Sr. High School  
Ponderosa Elementary  
Ridge View Elementary School  
Skyview High School  
Todd Beamer High School  
WyEast Middle School

#### **WEST VIRGINIA**

Bridge Street Middle School  
Hedgesville High School  
Hinton Area Elementary  
Kellogg Elementary School  
Lincoln High School  
Martinsburg High School  
Monongah Middle School  
Mountain Ridge Middle School

St. Joseph Catholic School  
Summersville Middle School  
Warm Springs Intermediate School  
Weirton Elementary  
Winfield High School

#### **WISCONSIN**

Altoona Middle  
Bloomer High  
D C Everest Middle  
Galesville-Ettrick-Trempealeau High  
Holmen High  
Kewaskum Elementary  
Luther High School  
New Directions Learning Community  
Oak Creek West Middle  
Sandhill Elementary  
Somerset Elementary  
Tomahawk Middle  
Viroqua High

#### **WYOMING**

Cody Middle School  
Davis Middle School  
Dildine Elementary  
Henry A. Coffeen Elementary  
Kemmerer Junior Senior High School  
Lander Middle School  
Meadowlark Elementary  
Pinedale High School  
Pinedale Middle School  
Pioneer Park Elementary  
Rawlins High School  
St Anthony Tri-Parish Catholic School  
Triumph High School



## 10 Appendix C: App Developers by Category

Figure 10.1 — Top CEP App Developers by # Apps in Sample

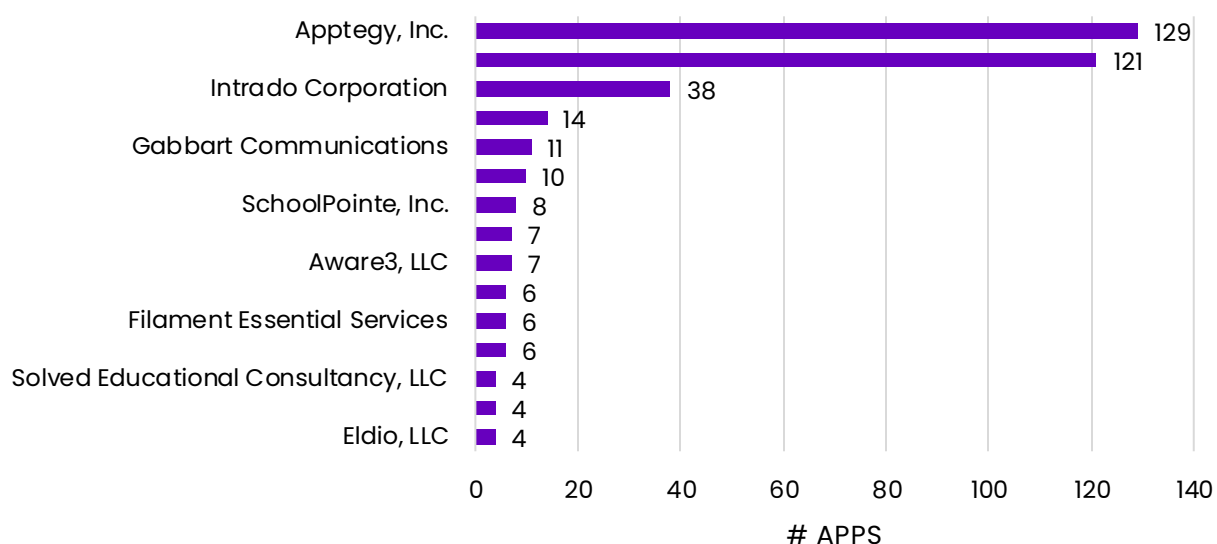


Figure 10.2 — CMS App Developers by # Apps in Sample

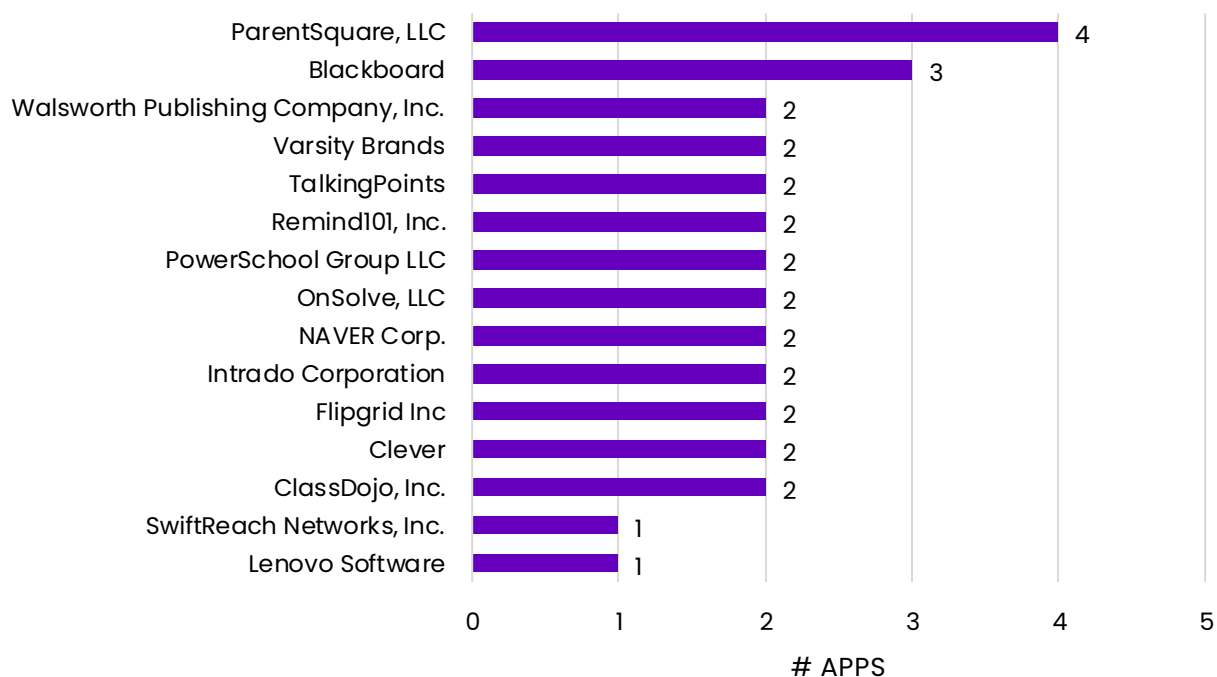


Figure 10.3 — DLP Developers by # Apps in Sample

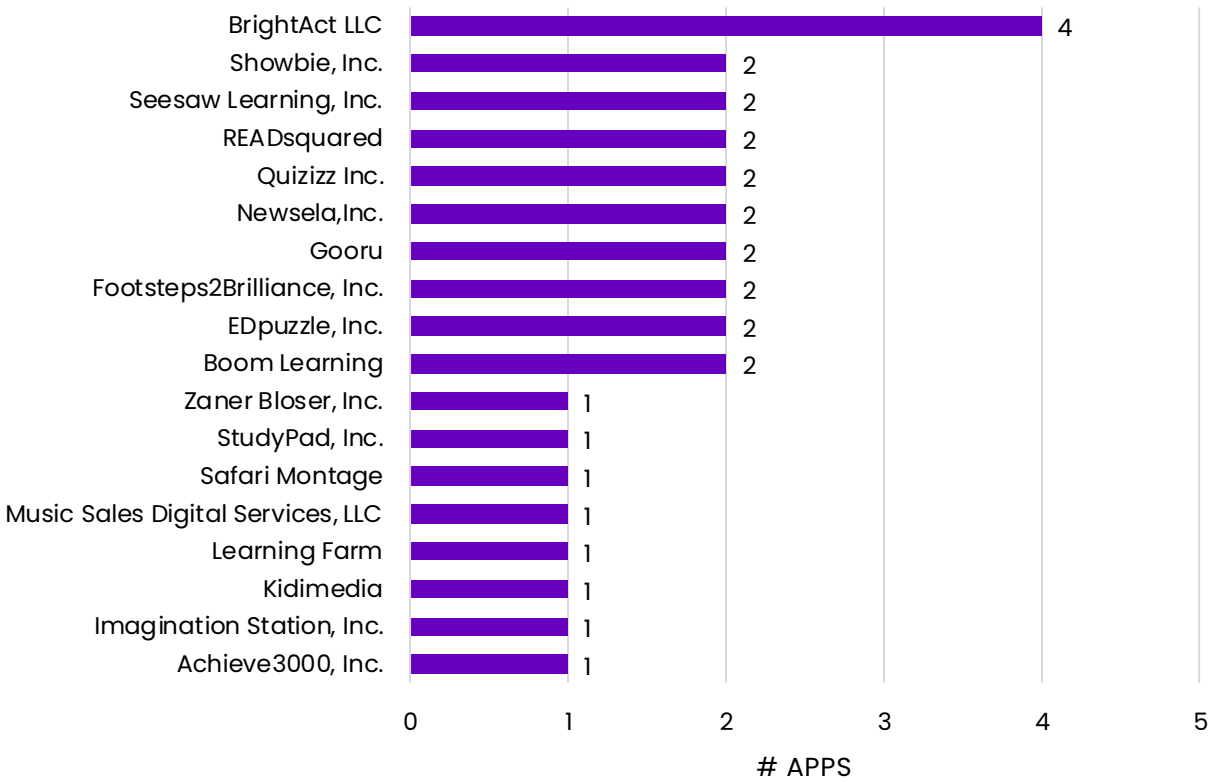


Figure 10.4 — LeMS App Developers by # Apps in Sample

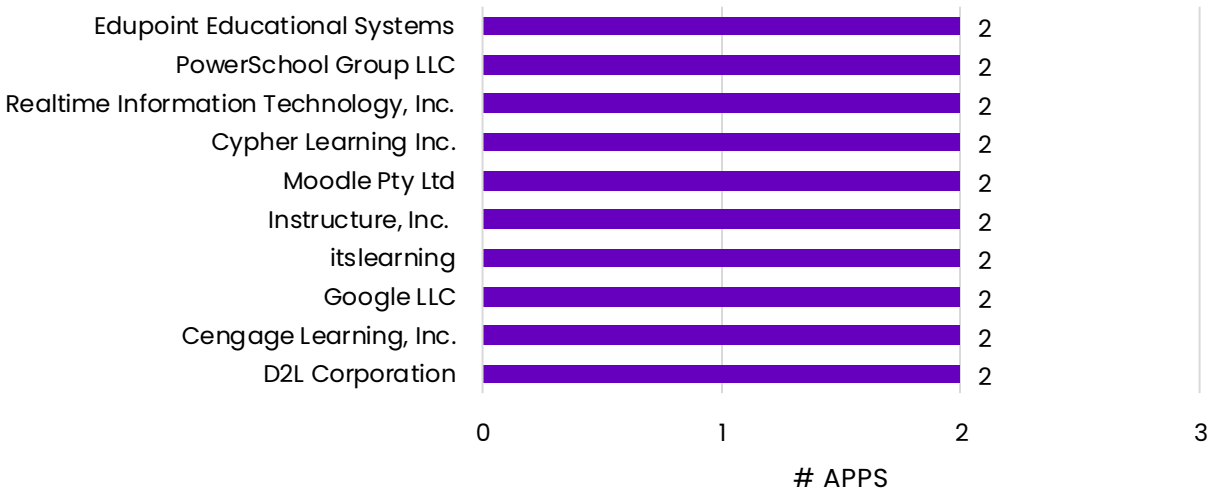


Figure 10.5 — LiMS App Developers by # Apps in Sample

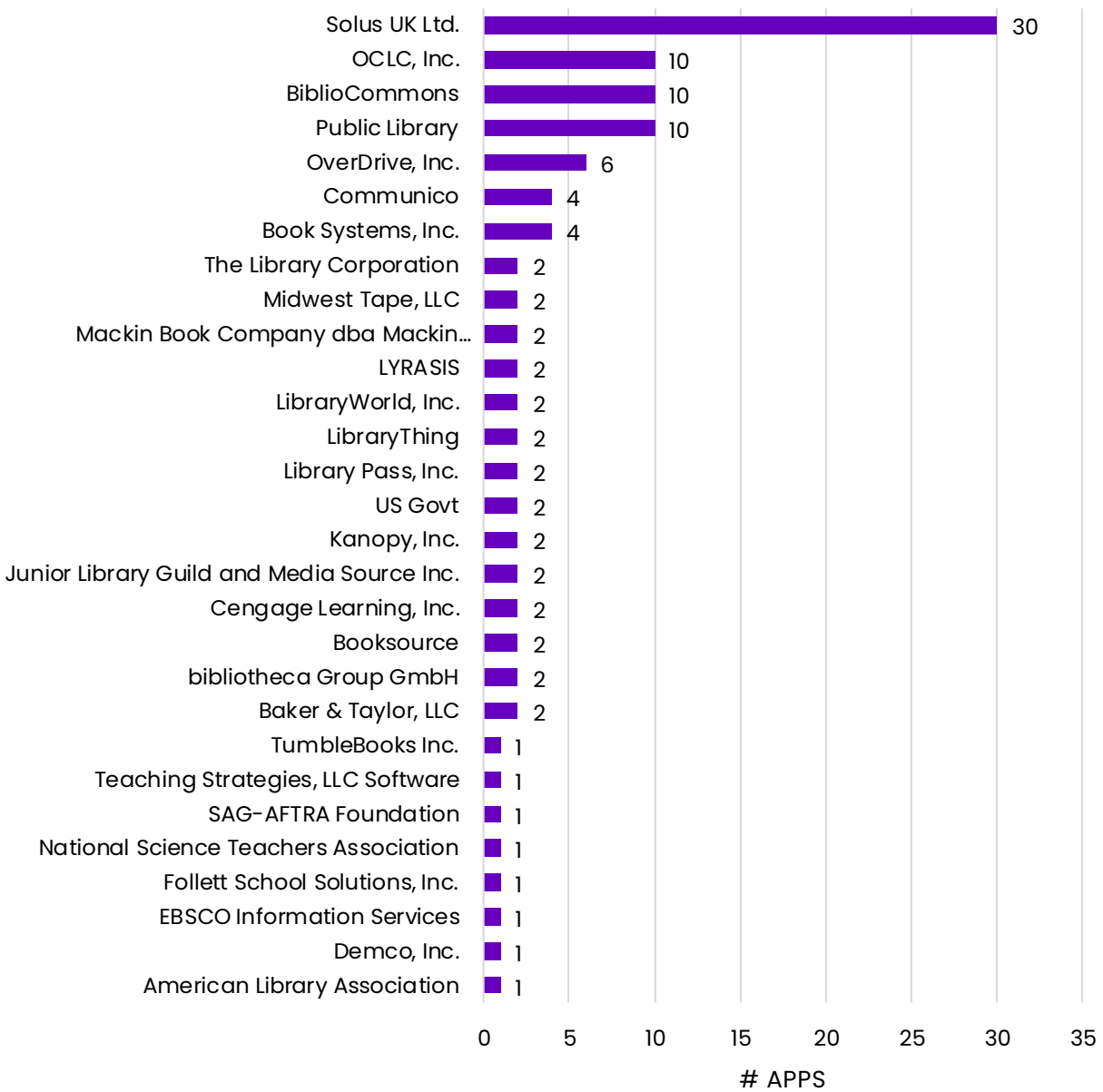


Figure 10.6 — SIS App Developers by # Apps in Sample

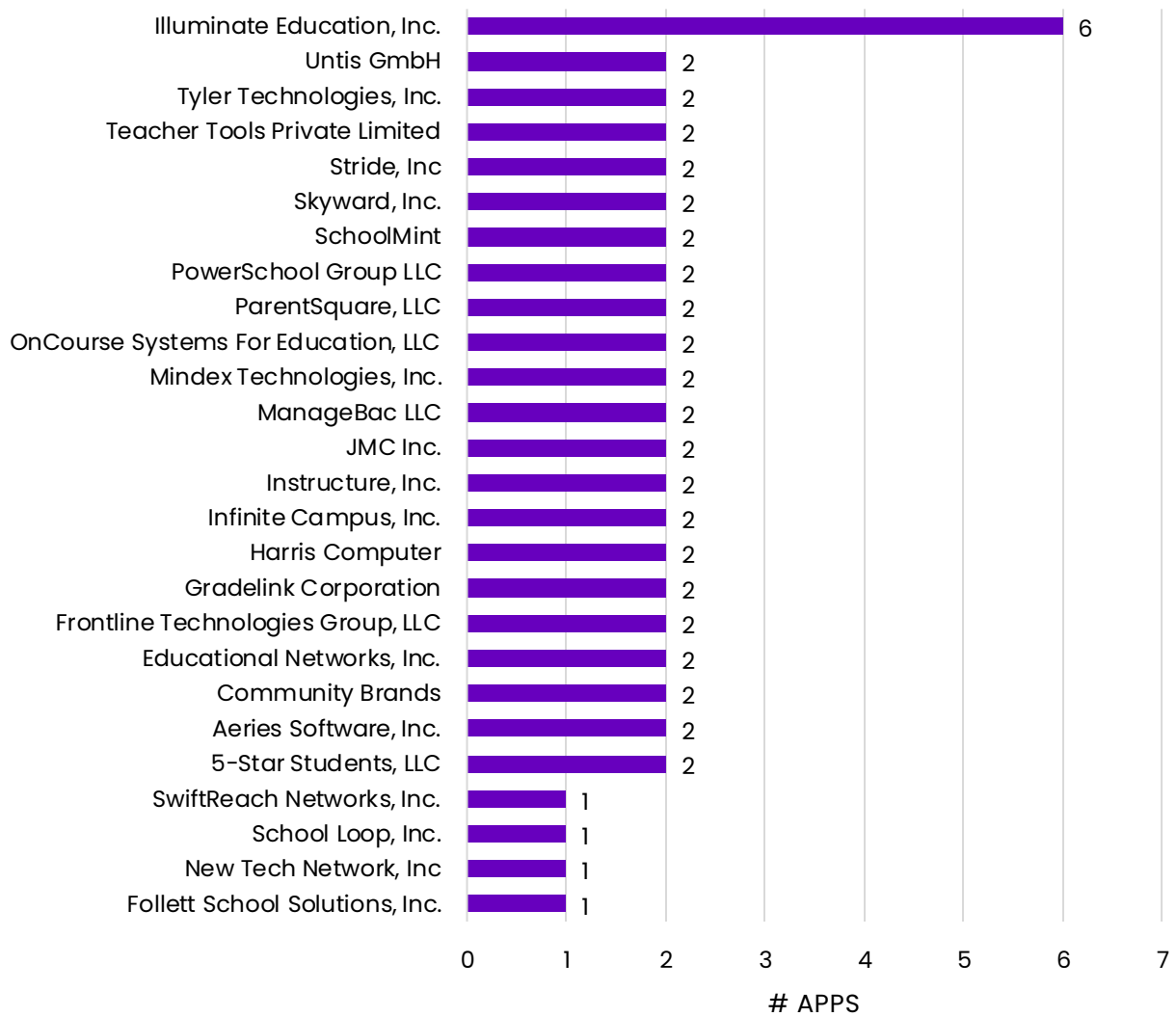


Figure 10.7 — SMS App Developers by # Apps in Sample

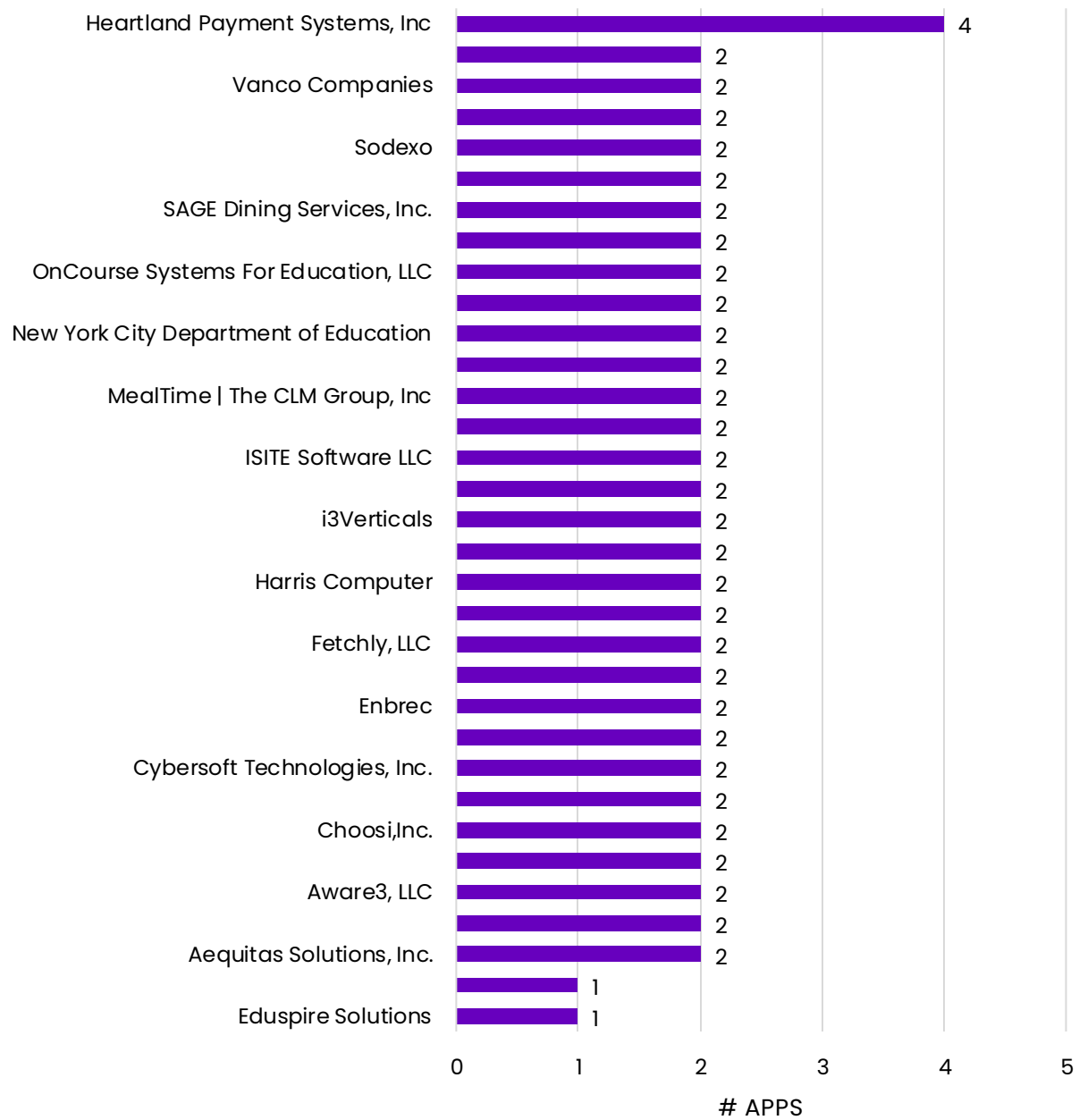


Figure 10.8 — SP App Developers by # of Apps in Sample

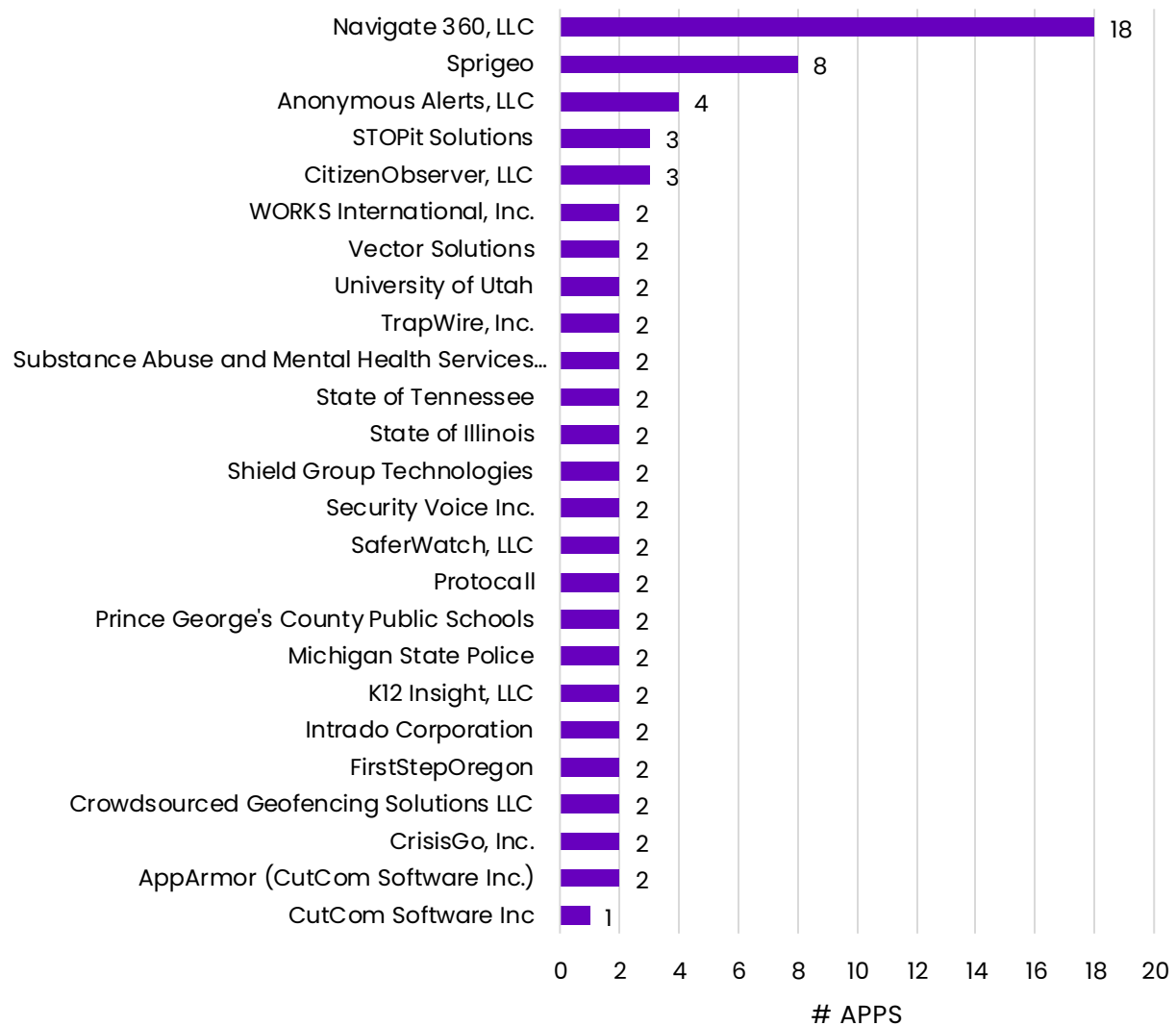


Figure 10.9 — SSO App Developers by # Apps in Sample

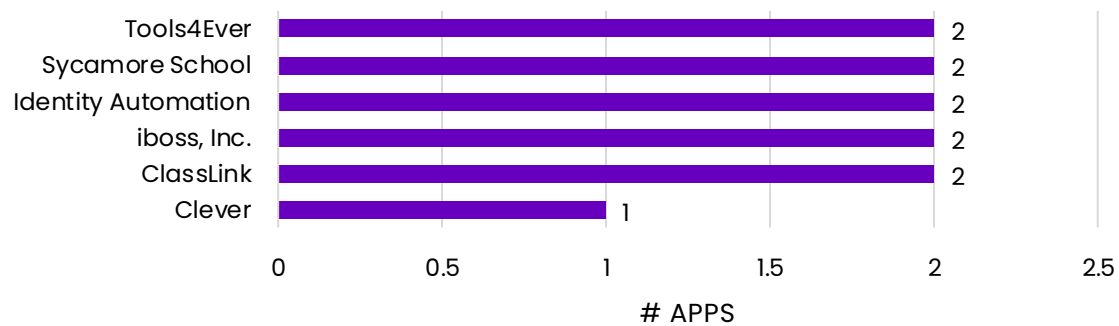


Figure 10.10 — ST App Developers by # Apps in Sample

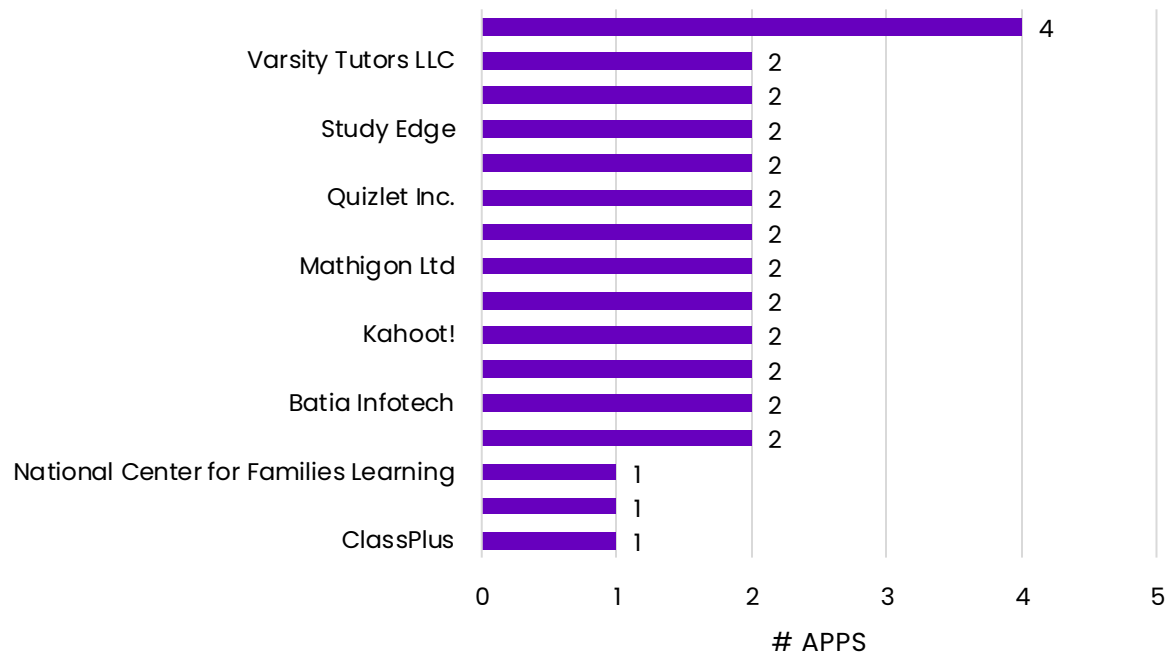


Figure 10.11 — STS App Developers by # Apps in Sample

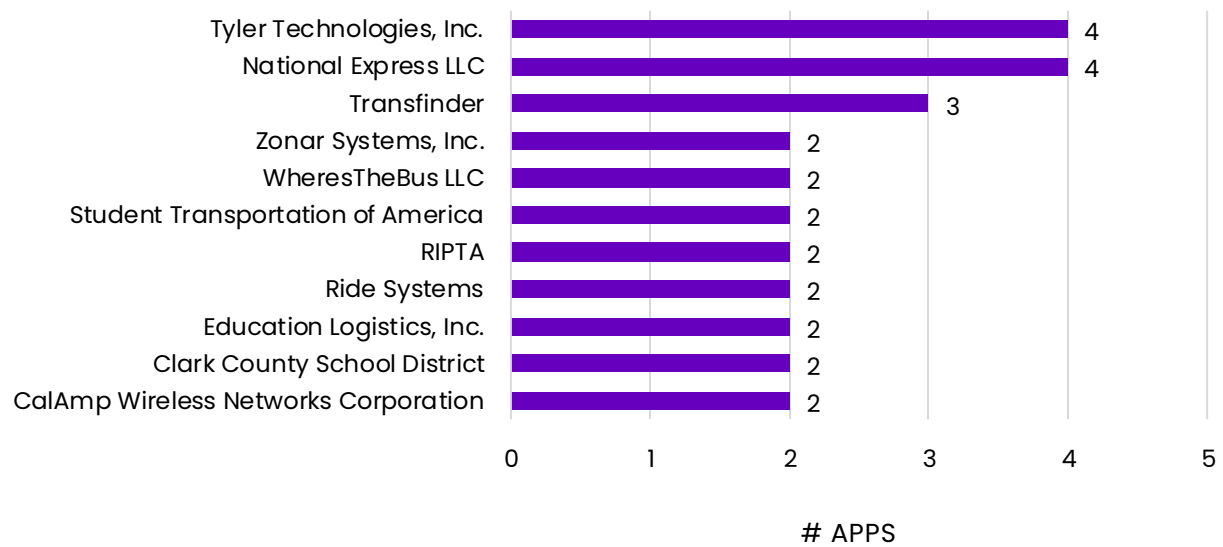
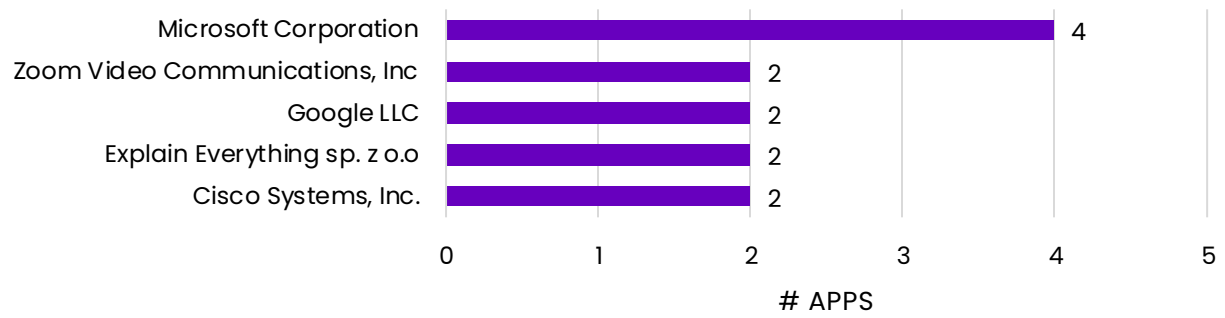


Figure 10.12 — VCS App Developers by # Apps in Sample





## 11 Appendix D: Permissions by App Category

Figure 11.1 — Permissions - CEP Apps

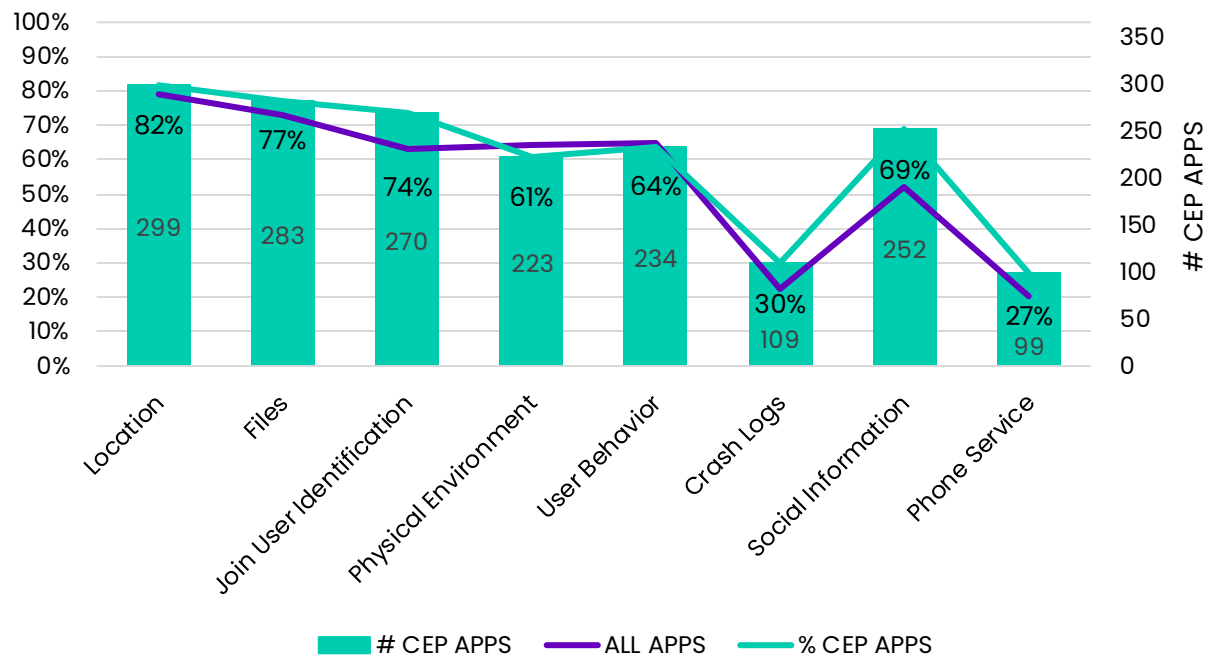


Figure 11.2 — Permissions - CMS Apps

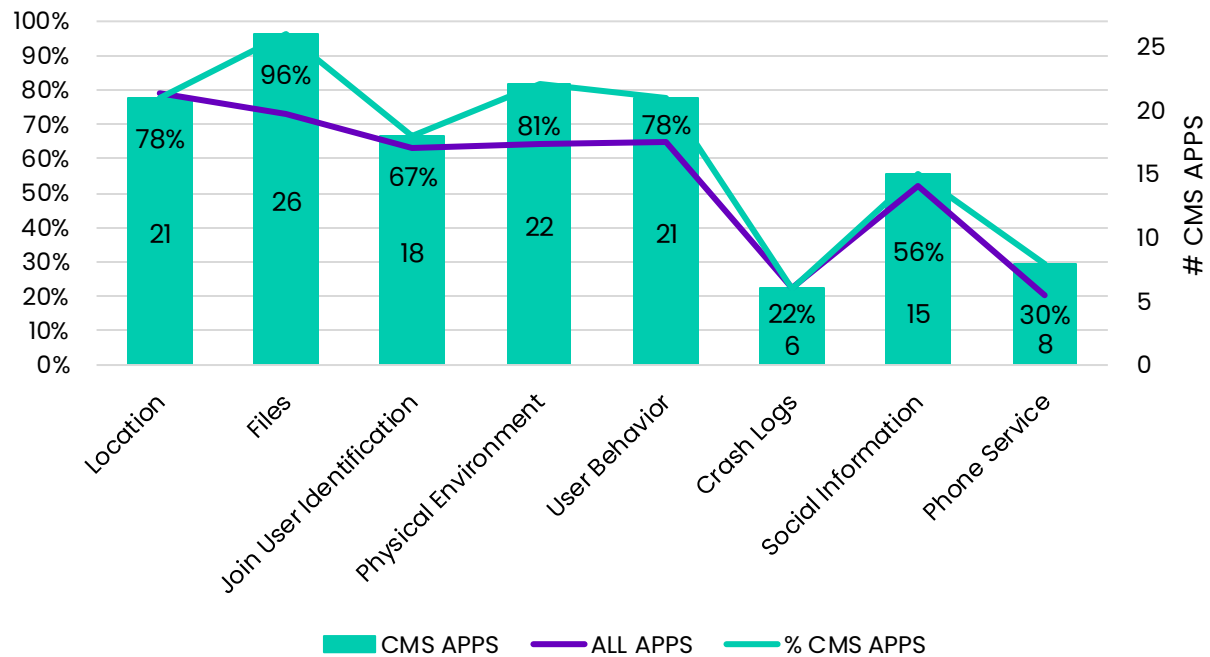


Figure 11.3 — Permissions - DLP Apps

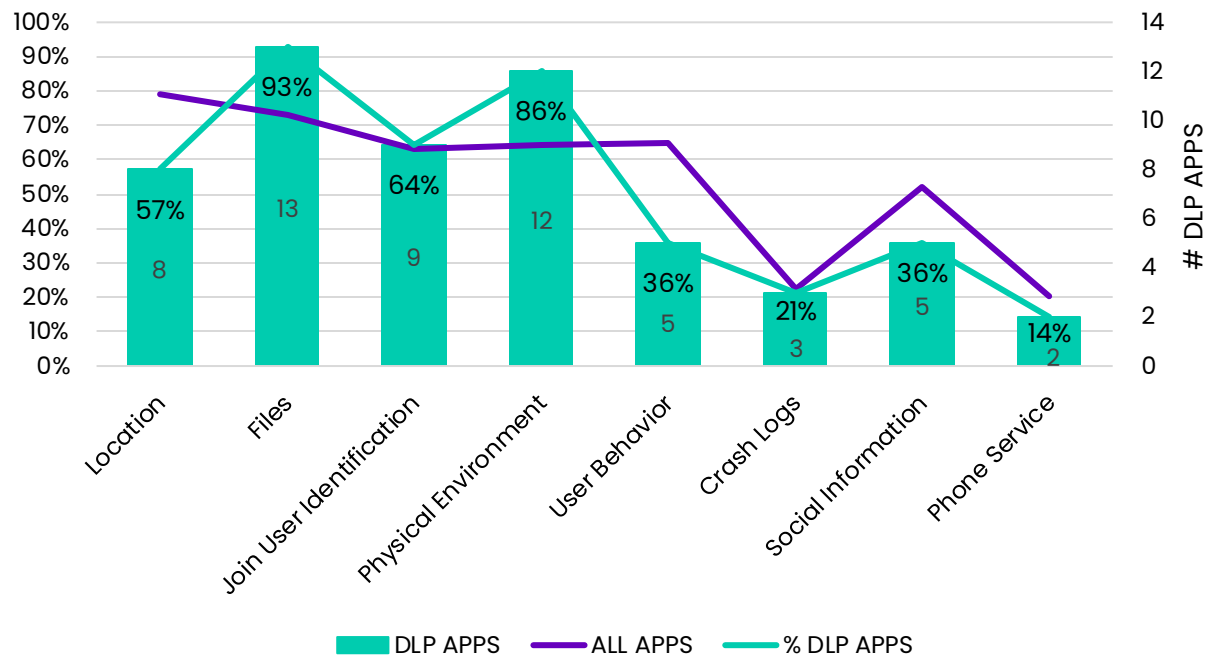


Figure 11.4 — Permissions LeMS Apps

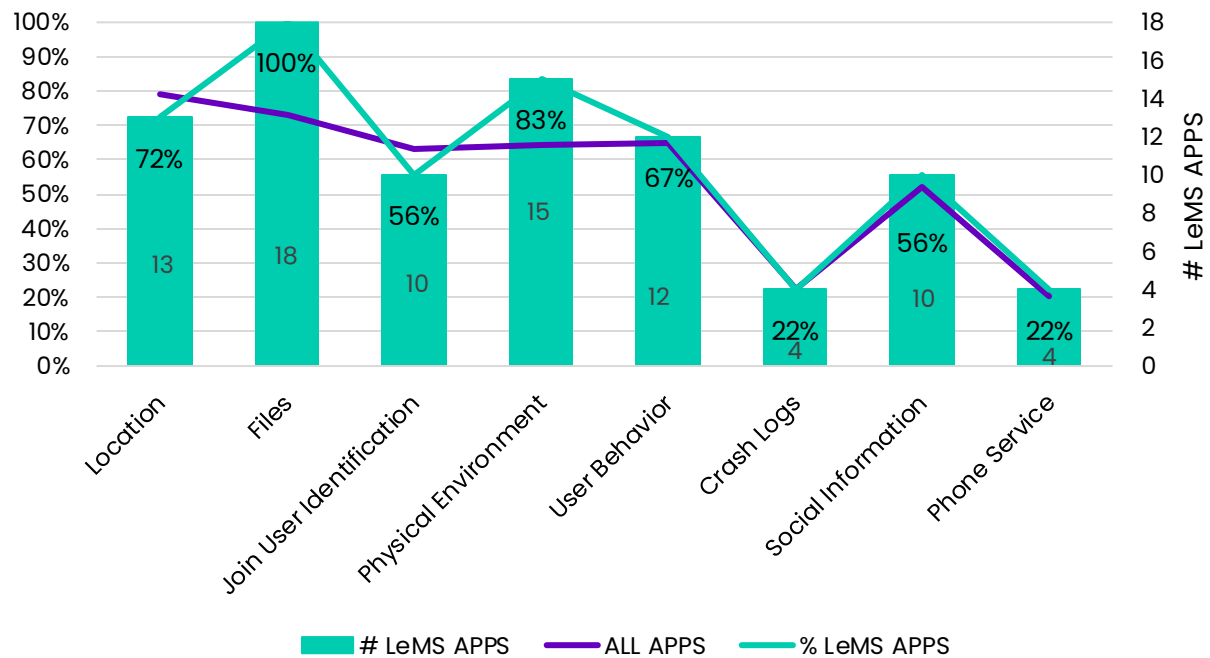


Figure 11.5 — Permissions - LiMS Apps

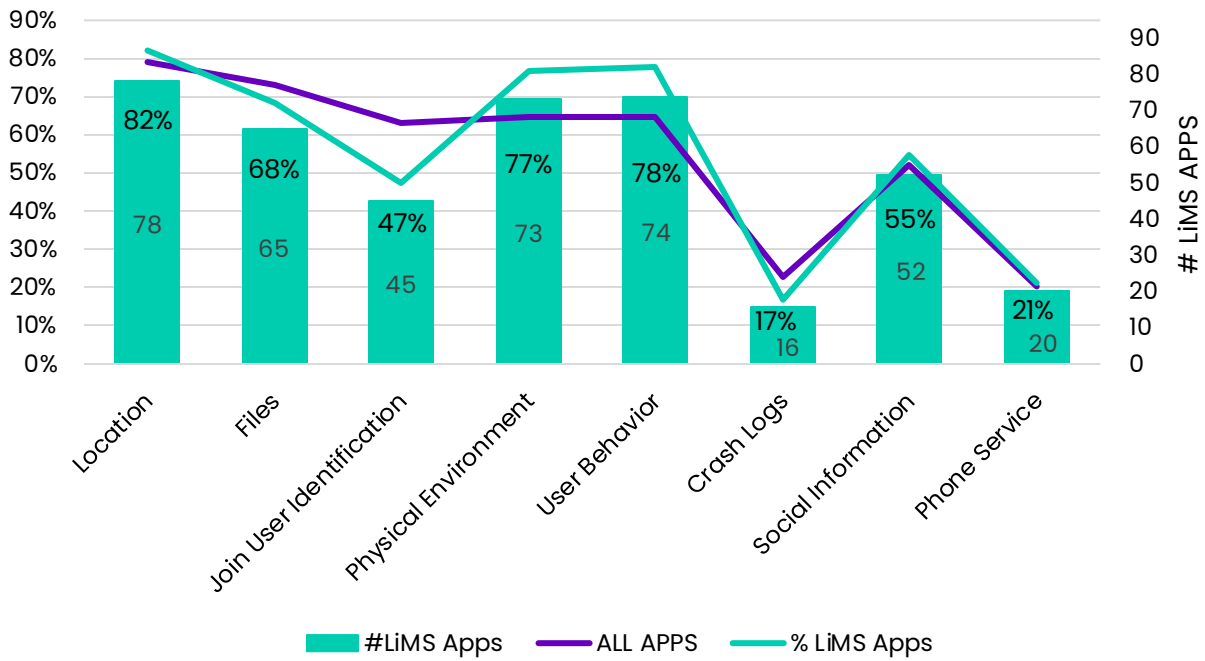


Figure 11.6 — Permissions - NES Apps

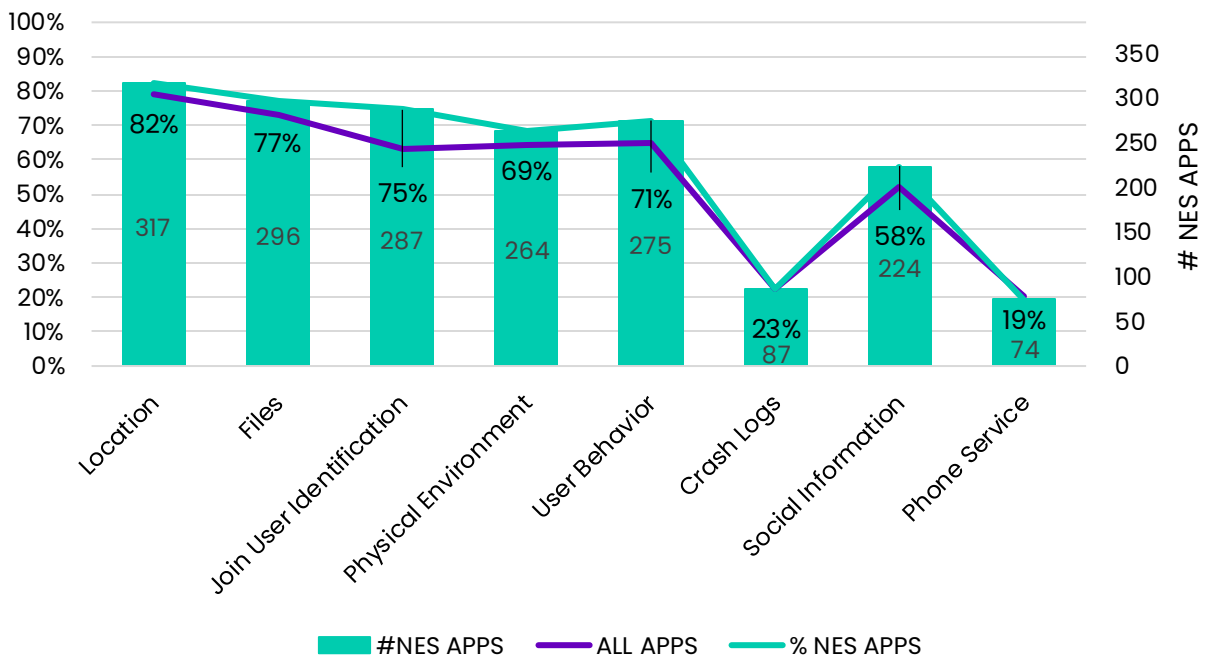


Figure 11.7 — Permissions - O Apps

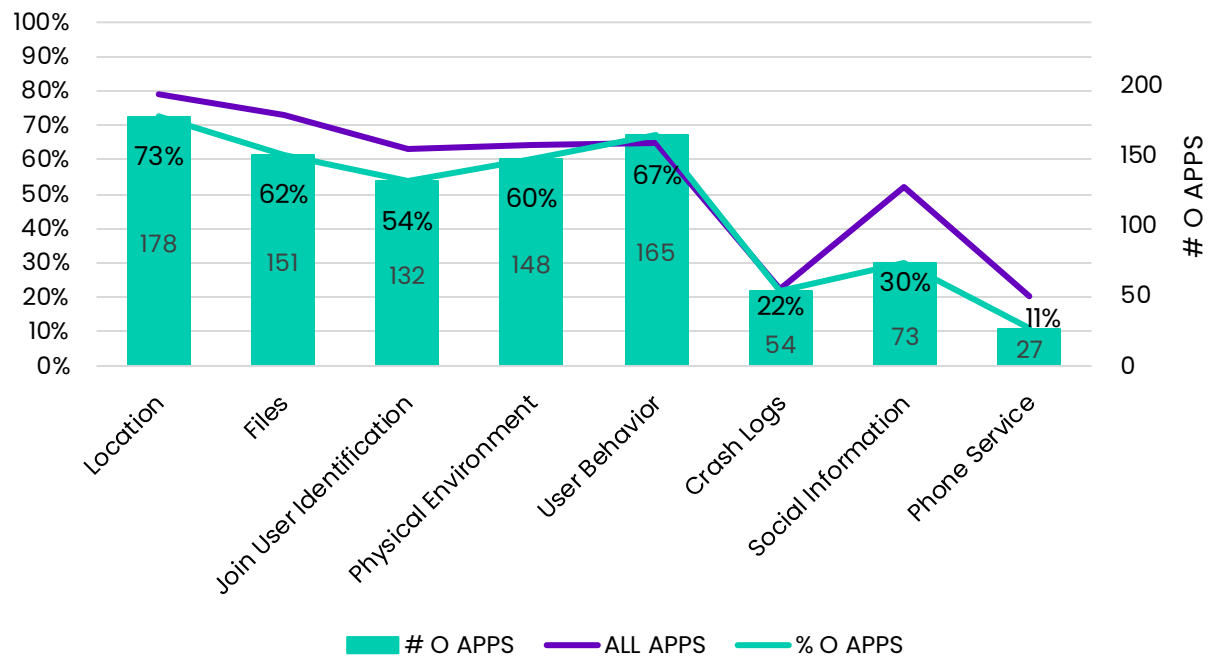


Figure 11.8 — Permissions - SIS Apps

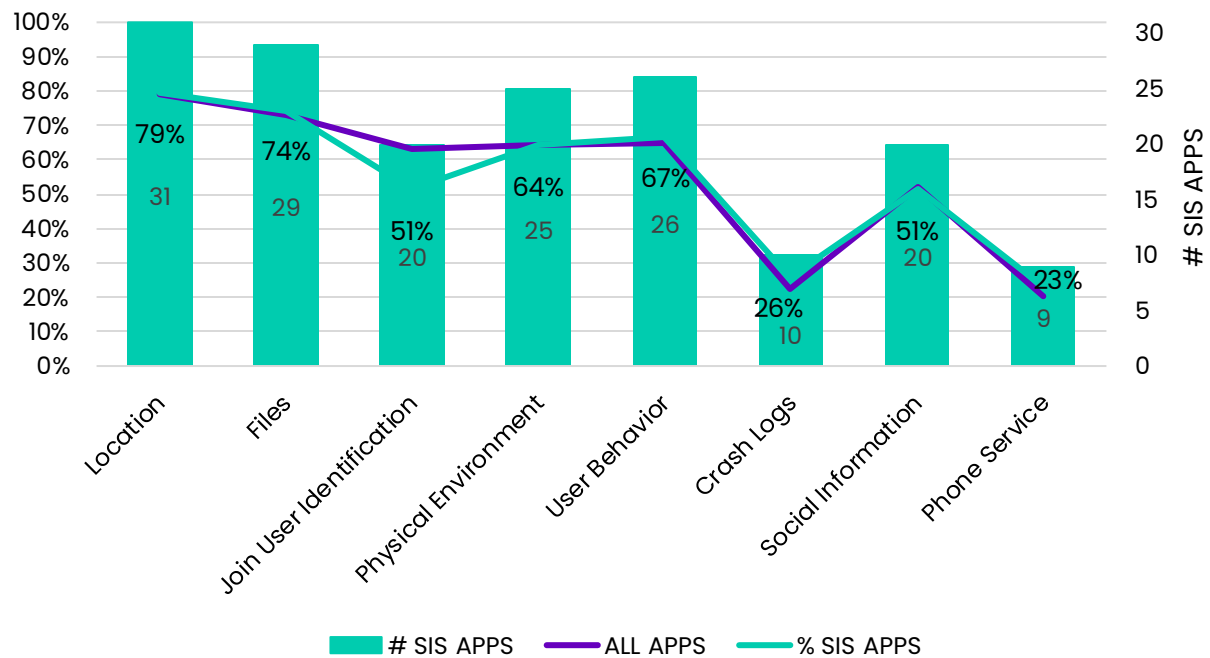


Figure 11.9 — Permissions - SMS Apps

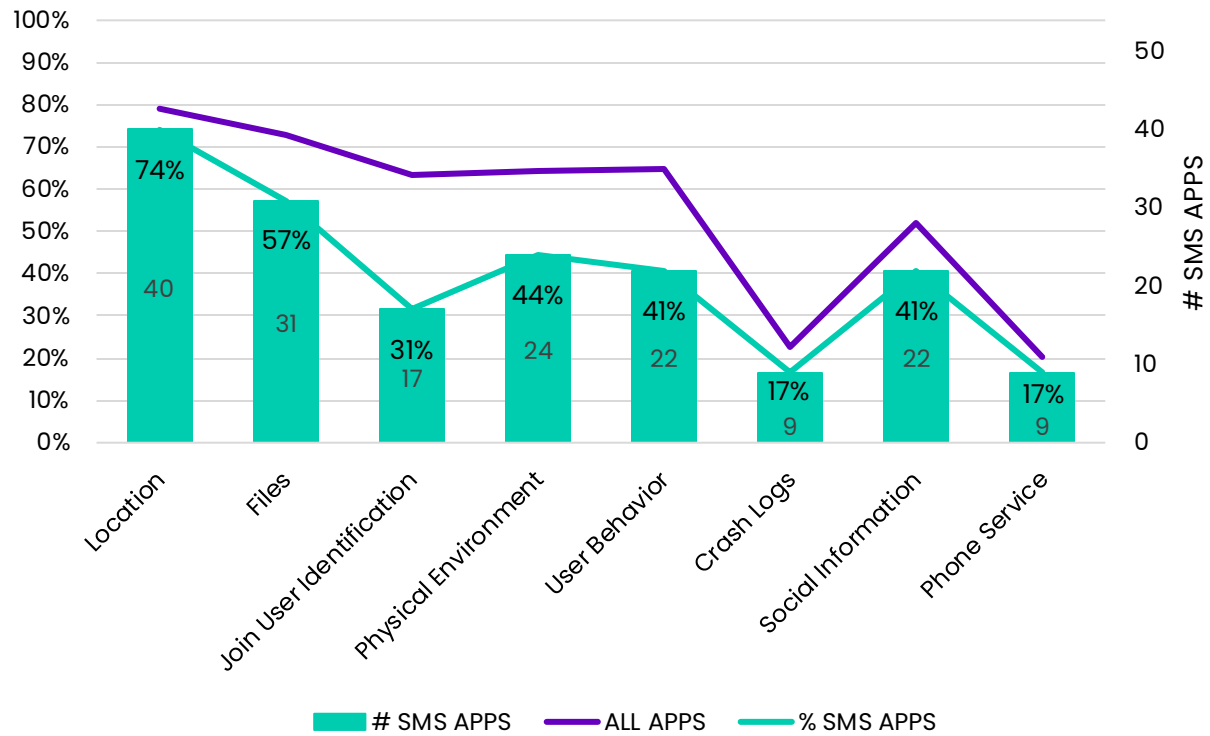


Figure 11.10 — Permissions - SP Apps

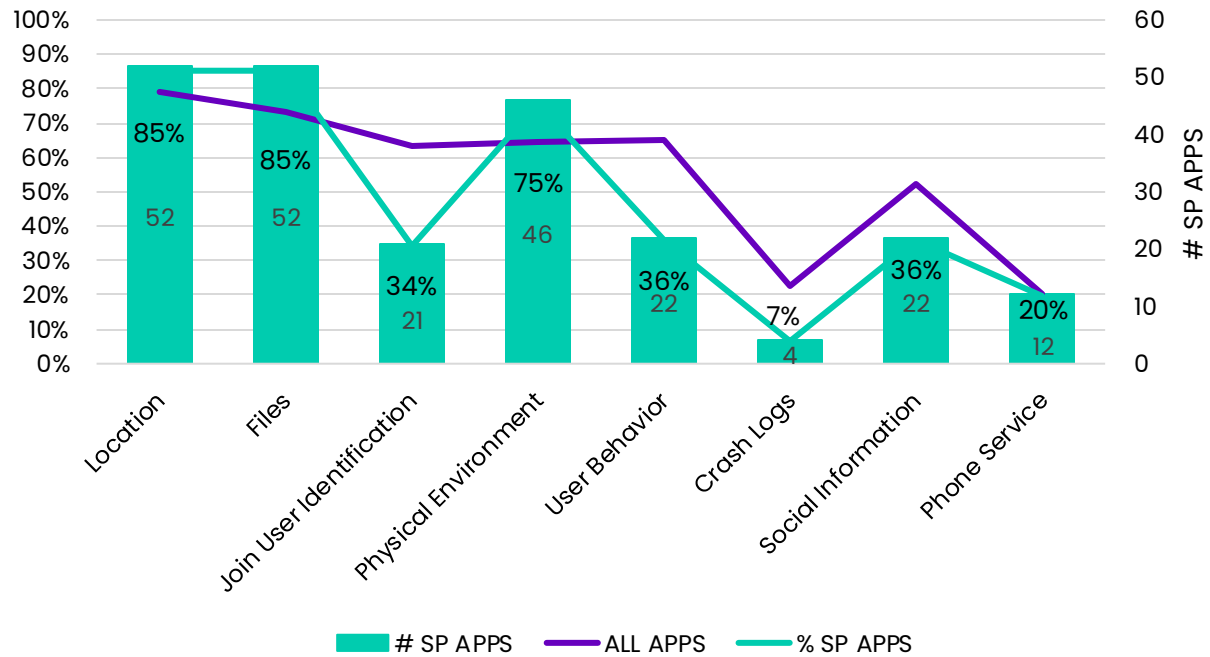


Figure 11.11 — Permissions - SSO Apps

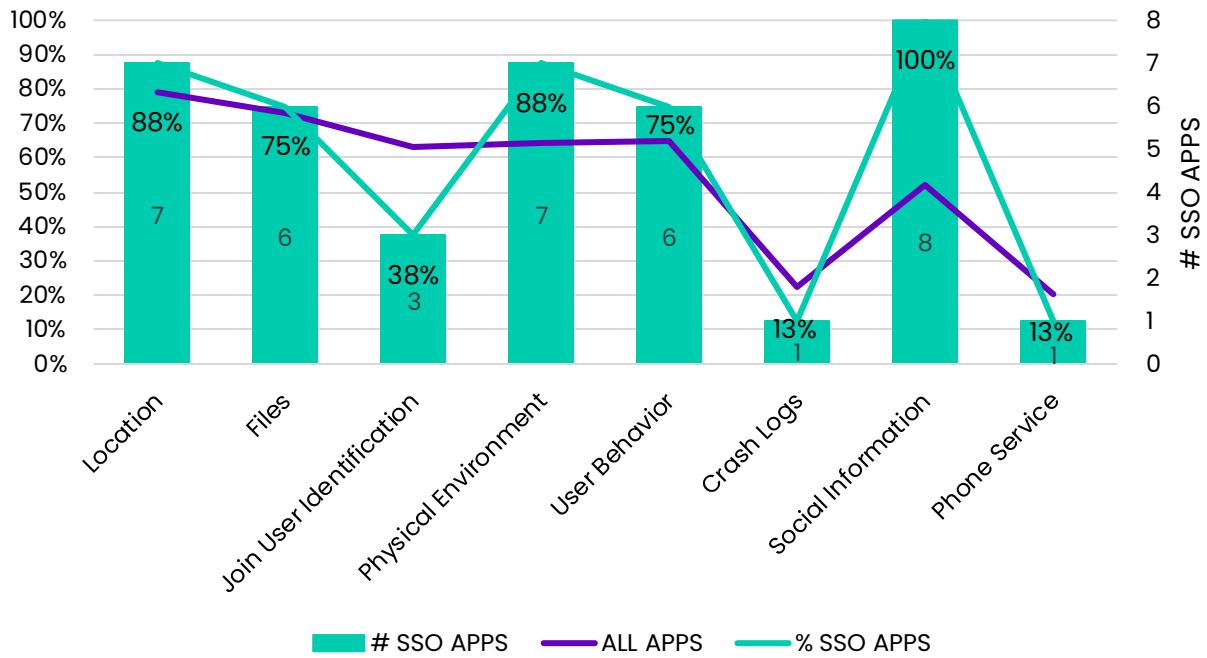


Figure 11.12 — Permissions - ST Apps

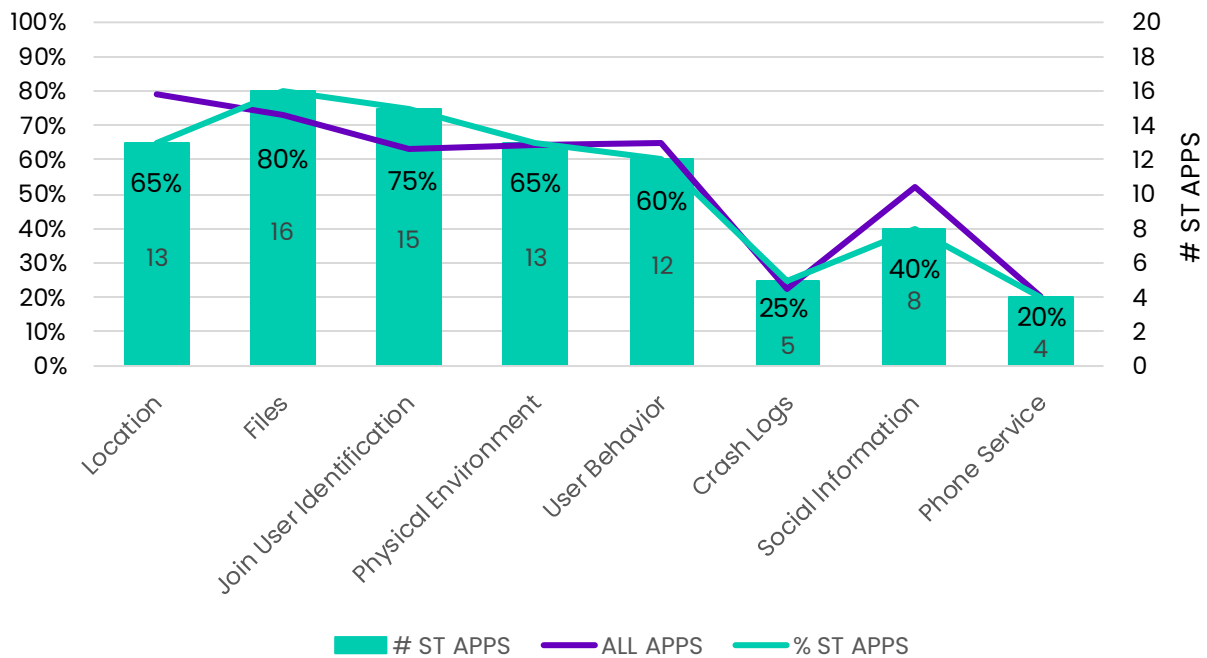


Figure 11.13 — Permissions - STS Apps

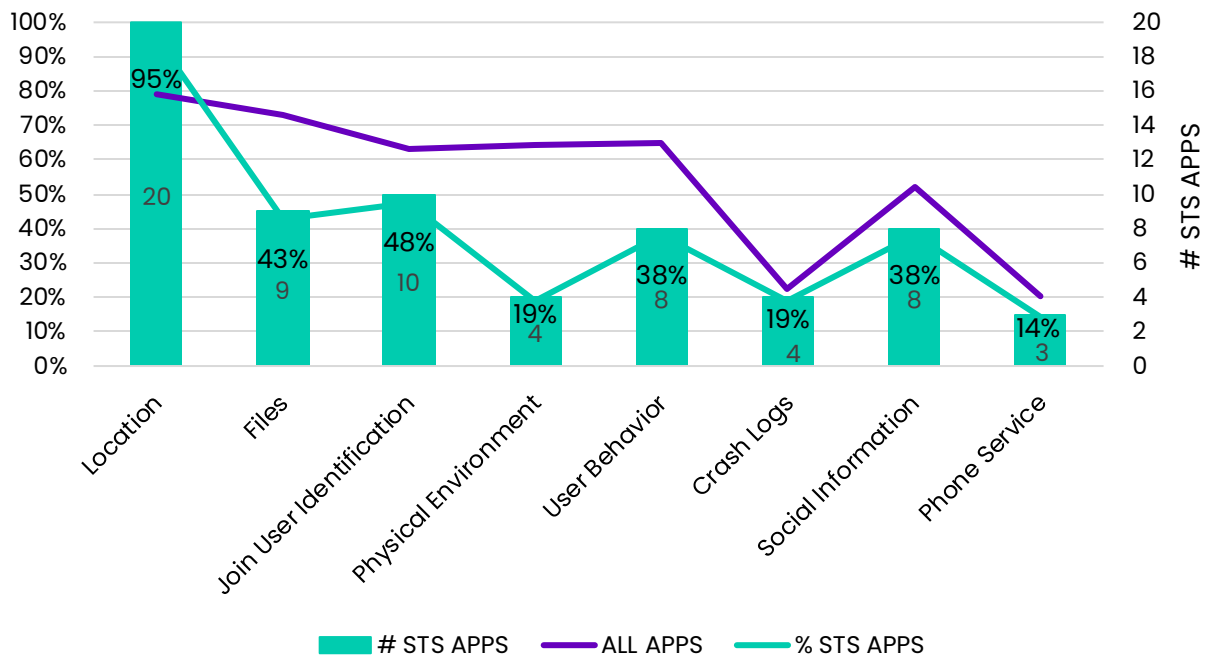
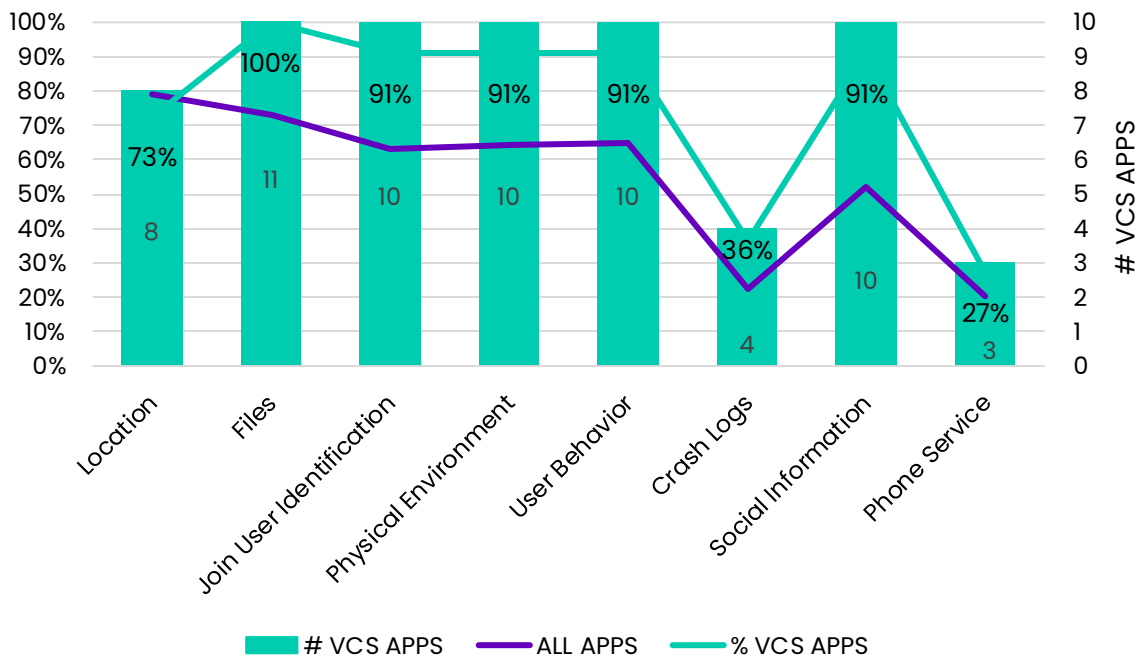


Figure 11.14 — Permissions - VCS Apps



## 12 Appendix E: Apps with Observed Retargeting Ads

App Name	OS	App Developer
<b>KidzSearch</b>	iOS	KidzSearch.com
<b>Flight Pilot Simulator 3D!</b>	iOS	Fun Games for Free
<b>Pixlr — Photo Collages, Effect</b>	iOS	Imagine Lab Pte. Ltd
<b>AllSides</b>	Android	AllSides LLC
<b>AllSides - Balanced News</b>	iOS	AllSides LLC
<b>Amazon Shopping</b>	Android	Amazon
<b>Amazon Shopping</b>	iOS	Amazon
<b>American Heritage English</b>	Android	MobiSystems, Inc.
<b>AP News</b>	iOS	The Associated Press
<b>AP News</b>	Android	The Associated Press
<b>BBC News</b>	Android	British Broadcasting Corporation
<b>BBC News</b>	iOS	British Broadcasting Corporation
<b>Blooket - Brain teasers games</b>	Android	Adapted Brain
<b>Brain it On!</b>	iOS	Orbital Nine
<b>Breathe+ Breathing Exercises</b>	iOS	DynamicAppDesign, Inc.
<b>Chess HD</b>	iOS	Optime Software
<b>Chicago Tribune</b>	Android	Tribune Publishing Company
<b>Chicago Tribune</b>	iOS	Tribune Publishing Company
<b>Clarion Ledger eNewspaper</b>	Android	Gannett Co., Inc.
<b>CNN Breaking US &amp; World News</b>	iOS	Warner Media Companies
<b>CNN: Breaking US &amp; World News</b>	Android	Warner Media Companies
<b>Colorfy</b>	iOS	Wildlife Studios
<b>COVID Coach</b>	Android	U.S. Department of Veterans Affairs
<b>COVID Coach</b>	iOS	U.S. Department of Veterans Affairs
<b>Cymath - Math Problem Solver</b>	Android	Cymath LLC



<b>Cymath - Math Problem Solver</b>	iOS	Cymath LLC
<b>Delta Mathematics</b>	Android	deltaco
<b>Delta Mathematics</b>	iOS	deltaco
<b>Dictionary - Merriam-Webster</b>	Android	Merriam-Webster, Inc.
<b>Dictionary.com English Word Me</b>	Android	Dictionary.com, LLC
<b>Dictionary.com: English Words</b>	iOS	Dictionary.com, LLC
<b>Encyclopædia Britannica</b>	iOS	Encyclopaedia Britannica, Inc.
<b>Flight Pilot: 3D Simulator</b>	Android	Fun Games for Free
<b>Happy Color® - Color by Number</b>	Android	X-FLOW LTD
<b>Happy Color® - Color by Number</b>	iOS	X-FLOW LTD
<b>Imgflip: Make Memes &amp; GIFs</b>	Android	Imgflip LLC
<b>Issuu: magazine &amp; books</b>	Android	Issuu Inc.
<b>Journal Star</b>	Android	Lee Enterprises Inc.
<b>Journal Star</b>	iOS	Lee Enterprises Inc.
<b>KEVN Black Hills FOX News</b>	iOS	Gray Television, Inc.
<b>KEVN Black Hills FOX News</b>	Android	Gray Television, Inc.
<b>Key Ring Reward Cards</b>	iOS	InMarket Media LLC
<b>Key Ring: Your mobile wallet</b>	Android	InMarket Media LLC
<b>Kids Doodle - Color &amp; Draw</b>	Android	Beauty Photo, LLC
<b>Kids Doodle - Draw Sketch</b>	iOS	Beauty Photo, LLC
<b>KidzSearch Safe Search Engine</b>	Android	KidzSearch.com
<b>KOTA News</b>	iOS	Gray Television, Inc.
<b>KOTA Territory News</b>	Android	Gray Television, Inc.

<b>KQED</b>	iOS	KQED Inc.
<b>Merriam-Webster Dictionary</b>	iOS	Merriam-Webster, Inc.
<b>Omaha World-Herald Omaha.com</b>	Android	Lee BHM Corp.
<b>Omaha World-Herald Omahacom</b>	iOS	Lee BHM Corp.
<b>Paint.ly - Color by Number</b>	Android	Newque Tech Limited
<b>Paint.ly Color by Number Game</b>	iOS	Newque Tech Limited
<b>Pixlr — Photo Editor</b>	Android	Inmage Lab Pte. Ltd
<b>Pocket: Save. Read. Grow.</b>	Android	Mozilla Corporation
<b>Rapid City Journal</b>	Android	Lee Enterprises Inc.
<b>Rapid City Journal</b>	iOS	Lee Enterprises Inc.
<b>Run Marco!</b>	iOS	Allcancode, Inc.
<b>SBLive Sports</b>	Android	SBLive Sports
<b>SBLive Sports</b>	iOS	SBLive Sports
<b>Scientific American</b>	Android	Springer Nature America, Inc.
<b>ScoreStream High School Sports</b>	Android	ScoreStream Inc.
<b>ScoreStream Sports Scores</b>	iOS	ScoreStream Inc.
<b>Semantle: Daily Word Game</b>	Android	David Turner
<b>Semantle: Daily Word Game</b>	iOS	David Turner
<b>Sesame Street</b>	iOS	Sesame Workshop
<b>St. Louis Post-Dispatch</b>	Android	Lee Enterprises Inc.
<b>St. Louis Post-Dispatch</b>	iOS	Lee Enterprises Inc.
<b>Target</b>	Android	Target
<b>Target</b>	iOS	Target
<b>The Weather Channel</b>	iOS	TWC Product and Technology, LLC dba The Weather Company
<b>The Weather Channel - Radar</b>	Android	TWC Product and Technology, LLC dba The Weather Company
<b>Today's Top News - USA TODAY</b>	iOS	Gannett Co., Inc.
<b>TurtleDiary</b>	Android	TurtleDiary

<b>Twitter</b>	Android	Twitter
<b>Twitter</b>	iOS	Twitter
<b>USA TODAY</b>	Android	Gannett Co., Inc.
<b>Weather Underground: Local Map</b>	iOS	IBM
<b>Youtube</b>	Android	Google LLC
<b>Youtube: Watch, Listen, Stream</b>	iOS	Google LLC
<b>Central Dauphin Schools</b>	iOS	Anthology (Blackboard)
<b>Hays USD 489, KS</b>	Android	Apptegy, Inc.
<b>Alexandria City Public Schools</b>	iOS	Anthology (Blackboard)
<b>Alexandria City Public Schools</b>	Android	Anthology (Blackboard)
<b>Atlanta Public Schools (APS)</b>	Android	Anthology (Blackboard)
<b>Atlanta Public Schools (APS)</b>	iOS	Anthology (Blackboard)
<b>Berkeley County Schools (WV)</b>	Android	Anthology (Blackboard)
<b>Berkeley County Schools (WV)</b>	iOS	Anthology (Blackboard)
<b>Birmingham City Schools</b>	Android	Anthology (Blackboard)
<b>Birmingham City Schools</b>	iOS	Anthology (Blackboard)
<b>Blue Valley Schools KS</b>	iOS	Anthology (Blackboard)
<b>Central Dauphin Schools</b>	Android	Anthology (Blackboard)
<b>East Allen County Schools</b>	iOS	Apptegy, Inc.
<b>Fort Smith PS Athletics</b>	Android	Mascot Media, LLC
<b>Hays CISD</b>	Android	Anthology (Blackboard)
<b>Hays CISD</b>	iOS	Anthology (Blackboard)
<b>Hays USD 489, KS</b>	iOS	Apptegy, Inc.
<b>Henry County Schools (GA)</b>	Android	Anthology (Blackboard)

<b>Hudson City Schools - Ohio</b>	iOS	Anthology (Blackboard)
<b>Hudson City Schools - Ohio</b>	Android	Anthology (Blackboard)
<b>Jamestown 1-ND</b>	iOS	Anthology (Blackboard)
<b>Jefferson West USD 340</b>	iOS	Apptegy, Inc.
<b>Jefferson West USD 340</b>	Android	Apptegy, Inc.
<b>KHSAA/Riherds Scoreboard</b>	iOS	Frank Riherd
<b>Madison County Schools</b>	Android	Anthology (Blackboard)
<b>Madison County Schools</b>	iOS	Anthology (Blackboard)
<b>Montgomery Public Schools</b>	Android	Anthology (Blackboard)
<b>Oakes Public Schools</b>	iOS	Anthology (Blackboard)
<b>Oakes Public Schools</b>	Android	Anthology (Blackboard)
<b>OCPS</b>	Android	Intrado Corporation
<b>OCPS</b>	iOS	Intrado Corporation
<b>Ohio County Schools, WV</b>	Android	Apptegy, Inc.
<b>Ohio County Schools, WV</b>	iOS	Apptegy, Inc.
<b>Palm Beach County School Dist</b>	Android	Intrado Corporation
<b>Palm Beach County School Dist</b>	iOS	Intrado Corporation
<b>Plant City High School</b>	Android	Heather Hanks
<b>Plant City HS</b>	iOS	Heather Hanks
<b>Prince George's County PS</b>	iOS	Anthology (Blackboard)
<b>Prince George's County PS</b>	Android	Anthology (Blackboard)
<b>Providence Schools</b>	Android	Anthology (Blackboard)
<b>Ritenour Schools</b>	Android	Anthology (Blackboard)
<b>Ritenour Schools</b>	iOS	Anthology (Blackboard)
<b>Westover Christian Academy</b>	Android	Apptegy, Inc.
<b>Westover Christian Academy</b>	iOS	Apptegy, Inc.

<b>AntiStress &amp; Relaxing Games</b>	iOS	Moreno Maio
<b>Newsy - Video News</b>	iOS	E.W. Scripps Company
<b>Planner 5D: Interior Design</b>	iOS	Planner5D, UAB
<b>OCD.app - Anxiety Mood &amp; Sleep</b>	iOS	GG Apps
<b>Marshall Public Schools, MO</b>	iOS	Apptegy, Inc.